

PURPOSE:

Chatham Area Transit CAT's (CAT) records and data are valuable assets and should be well-organized, easy to retrieve, and destroyed in accordance with this policy and the retention schedule. Proper management of CAT's records and data ensures the quality, reliability, integrity, share ability, security, and transparency of the records and data.

CAT requires records be managed in an efficient and economical manner and in accordance with applicable compliance requirements. Through the implementation of this policy, CAT's intends to;

1. ensure compliance with Records Hold Orders,
2. improve access to CAT Records,
3. manage vital records that are essential for continuity of business in the event of a disaster and
4. safeguard the privacy and security of personal information.
5. provide a schedule to retain records for a period of time

DEFINITIONS:

1. ***CAT Record:*** Information recorded in any medium including, any hard-copy or electronic writing, e-mail, instant message, drawing, graph, chart, photograph, audio or video recording, image, or other data or data compilation that;
 - a. is created, received or maintained by any individual subject to this policy in that person's business capacity,
 - b. relates to the CAT or its business, and
 - c. is in the possession, custody or control of the CAT or an individual subject to this policy.
2. ***Personally Identifiable Information (PII):*** Any data that could potentially be used to identify a particular person. Examples include a full name, Social Security number, driver's license number, bank account number, passport number, and email address.
3. ***Primary Records:*** CAT Records maintained as official records of the business operations.
4. ***Records Hold Order:*** Written notification developed by the Compliance Department in connection with a pending or reasonably foreseeable legal proceeding, government investigation, court order, or audit that identifies categories of information or specific CAT Records that are subject to a records hold.

5. **Records Hold Release Order:** Written notification developed by the Compliance Department in connection with releasing certain CAT Records from a records hold.
6. **Records Disposition Order:** Form developed by the Compliance Department in connection with the destruction or transfer of certain CAT Records.
7. **Vital Records:** Records that are essential for the continuation or survival of the CAT in the event of a disaster. Vital records are necessary to recreate the CAT's Compliance and financial status and to determine the rights and obligations of employees, customers, stockholders, and other stakeholders.

SPECIFICS:

It is each employee's responsibility to ensure that records in the employee's possession, custody or control are managed in accordance with this policy. A critical part of CAT's compliance with record management is the State of Georgia Local Government Records Retention Schedule ("Retention Schedule"). The Retention Schedule specifies how long to retain a records series and when/how, the records can be destroyed. The current version of the Retention Schedule is attached to this policy. As an additional resource, the following schedule retention period should never be less than what is required by law. That resource can be found at:

https://www.georgiaarchives.org/records/state_print_all

This policy will be reviewed every year to ensure the most updated Retention Schedule is attached.

PROCEDURE:

A. Records Retention

CAT Records will be retained for the period of time described in the Retention Schedule. All CAT Records intended for storage must contain a CAT Record Storage Label on each end of the storage box that provides the following information:

1. Storage Control No.;
2. Department;
3. Date;
4. Type of Document (as identified in the Retention Schedule);
5. The departmental manager's name and signature; and
6. The division chief's name and signature.

Once completed, the CAT Record Storage Label must be presented to the Chief of Staff for review and approval. The Chief of Staff will provide the Storage Control No. on the storage label. Additionally, the Chief of Staff will maintain a searchable log of CAT Records in storage that contains the same information as above.

CAT Records may be disposed of in a manner commensurate with their sensitivity if they:

1. do not need to be retained pursuant to the records Retention Schedule,
2. are no longer needed for business purposes, and
3. are not subject to a Records Hold Order.

B. Record Hold Orders

The Chief of Staff or Compliance Department will issue Records Hold Orders. CAT Records subject to a Records Hold Order must not, under any circumstances, be altered, mutilated, concealed, deleted, disposed of or otherwise destroyed. The Chief of Staff or Compliance Department will issue Records Hold Release Orders notifying individuals when disposal procedures may be resumed.

C. Records Disposition

Disposition is authorized at the end of the records lifecycle. Records eligible for disposition are those that are no longer required to be maintained by applicable laws and approved record schedules. At the completion of their retention period, records must be designated for disposition absent a records hold. In many cases, the appropriate disposition is destruction.

Disposition occurs when the record is no longer active. There are three options for disposition:

1. records may be placed in inactive storage if they are still within their retention period, but the frequency of their use has diminished;
2. records may be destroyed when the retention period has lapsed; or
3. with prior arrangement or as mandated in the schedules.

All records eligible for disposition must have a Disposition Order. The Disposition order must be approved by the Chief of Staff.

Decisions regarding the method of disposal or storage location are made by the department assigned chief and in conjunction with the Chief of Staff and the Compliance department, taking into account any legal considerations.

Records can be placed in inactive storage if the retention period has not expired. Once the retention period has expired, the records should be destroyed.

Each Department will ensure proper disposition of records after the inactive/retention period phase is complete and records have fulfilled their prescribed retention period.

D. E-mail and Electronic Documents

E-mail and other electronic documents are CAT Records and will be managed in accordance with this policy and the Retention Schedule.

E. Ownership of Records

In accordance with applicable federal, state and local laws of the United States, CAT Records are the property of the CAT.

F. Responsibility

Each department will:

- Implement and communicate this Policy.
- Develop a records retention schedule for CAT Records.
- Periodically review CAT Records to determine whether they may be disposed of in accordance with this policy.
- Ensure that CAT Records in the possession, custody or control of employees who are separating from CAT and non-employees (including consultants, contractors and temporaries) who cease to perform services for the CAT are managed in accordance with this policy.

The Chief of Staff in conjunction with the Compliance Department will be responsible for developing and issuing Records Hold Orders and Records Hold Release Orders.

G. Personnel Records

Employees may view their own personnel file or obtain a copy during normal business hours after submitting a written request. Employees may request modifications of information contained in their records. Such requests should be submitted in writing to the property HR designee along with supporting documentation. The Company may make changes where appropriate, in its sole discretion. Employees may submit for inclusion memoranda stating their opinions regarding any documents contained in their records.

Unauthorized release of employee information will be cause for disciplinary action up to and including termination of employment.

H. Access by Former Employees

A request for review of personnel records of former employees is limited to those who have terminated service within the preceding 12 months prior to the date of the request, unless otherwise required by state law. Reasonable copying costs may be charged.

I. Access Pursuant to Legal Process

The Company will provide such records on employees as are covered by this policy to a municipal court, state or federal agency, arbitrator, union representative or other legal process in response to a proper request, subpoena or order. Where practical, the Company will notify the employee or former employee of the contents of the subpoena or order before supplying.

J. Employee Responsibility

Employees are responsible for notifying management of changes in address, telephone number and/or family status (births, marriage, death, divorce, legal separation, etc.) as income tax status and group insurance may be affected by these changes.

K. Records Containing Personally Identifiable Information

Collection of PII

PII will be collected from applicants and employees as required in order to meet federal and/or state reporting requirements. These purposes include:

- To conduct pre-employment background checks.
- To verify eligibility for employment.
- To withhold federal and state taxes.
- To comply with state new-hire reporting.
- To facilitate enrollment in Company benefits plans.

Note: PII may also be collected from creditors, suppliers or independent contractors. PII obtained by CAT will be subject to the same provisions of privacy as those for applicants and employees.

Use of Social Security Numbers

Except for verification and reporting uses for the above-referenced reasons, no Social Security number or portion of a Social Security number will be used in the conduct of the Company's business; and,

- No Social Security number or portion of a Social Security number will be permitted to be used for the following purposes: identification badges, parking

permits, time cards, posted employee rosters, computer passwords, licenses, agreements or contracts.

- No Social Security number should be used in open computer transmissions except where such transmission of information is by secure connection.

Storage of and Access to PII

All documents containing PII shall be stored in secured filing cabinets. All computer applications containing PII numbers shall be maintained on secured, authorized-access computer stations only.

Only persons who have a legitimate business reason will have access to PII; such access will be granted through department heads responsible for functions with reporting or transporting of such data responsibilities. Department heads and employees granted such access must take all necessary precautions to ensure the integrity of records that include such information when the records are not being used.

Destruction of PII

Records that include PII will be maintained in accordance with this policy. When such documents are released for destruction, the records will be destroyed by shredding.

REFERENCES:

Georgia Archives- State Government Records Retention Schedule

APPLIES TO:

All CAT employees and Departments

ATTACHMENTS:

- A. CAT Retention Schedule
- B. CAT Records Storage Label
- C. Record Disposition order



Attachment A

LEGEND

Records Retention	
AC= Active	T = Termination
AU= Audit	LI = Life
AY= Award Year	CL = Closed/Completion
PR= Permanent	FY = Fiscal Year
FR = Final Resolution	LA = Last Activity

NOTE: Scheduled to be reviewed for revisions and approval annually.

RETENTION SCHEDULE

FINANCE (1 of 3)

AC =ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Accounts Payable	FY+7 years	Invoices, check copies, supporting documents		
Accounting	FY+7 years	Records and information related to management of CAT accounts, including payables, receivables, grants, expenses, books and ledgers Financial Statements - Records which provide an annual statement of net assets and activities; often called a comprehensive annual financial statement or report.	1096, 1099,W-9s, W-2s, Accounts Payable Accounts Receivable, Bank Reconciliation, Account Expenses, General Ledger, Journal Entries, Liabilities, Payroll Accruals	
Accounting	FY+7 years + 2 years	Records include: accounts payable files; accounts receivable files; bank statements; cancelled checks, vouchers, and EFTS; cash balances and reconciliations; cost accounting records; deposit slips and reconciliations; invoices; journal entries (journal vouchers); outstanding obligations; payment schedules; purchase orders; receipts; returned checks; reconciliations; refund/disbursement requests; moving expenses; agency-paid individual memberships and activities in professional organizations; registration fees; and travel authorization and reimbursement records.		
Audit – Internal Reviews	7 years + 2 years	Daily, weekly, monthly, quarterly, or other summary reviews, evaluation, etc.		
Audits External Final Reports	PR - Permanent	Final versions of CAT financial reports, whether required by regulations or generated to track financial transactions and achievements Reports prepared by the Department of Audits examining and verifying the agency's financial activities for a defined period of time; does not include the record copy maintained by the Department of Audits	Audit Reports, NTD, State Controller Report, Finance, Compensations, Triennial Reviews Reports, Findings, Correspondence, Financial Management – Capacity, Maintenance Capacity, Title VI, Procurement, DBE, Legal, Project Planning/Program, Public Comment, Safety, Security, Drug Free Workplace, Drug and Alcohol, EEO, etc.	
Annual Reports	PR – Permanent	Annual Reports that summarizes agency functions and activities		
Annual Payroll Earnings	FY + 51 years	Summary of employees' payroll earnings for fiscal year, including deductions.		
Deduction Records	FY+4 years	Records documenting individual employee's authorization to withhold taxes and other deductions from employees pay		
Banking Administration	7 years	Records and information related to the administration of banking activities	Banking resolutions, Signature Authority	
Budgets	FY+7 years	Records and information relating to creating and implementing organizational budgets	Capital Budget, Operating Budget, Budget adjustments, Budget Amendments, Budget Outlook, Presentations, Supporting Documentation	
	PR - Permanent	Approved Budget		

RETENTION SCHEDULE

FINANCE (2 of 3)

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Collections	CL+5 years	This series includes records documenting an agency's efforts to collect unpaid accounts; includes PeopleSoft collection reports		
Cost Accounting	3 years + 2 years	Financial reports by cost center for all expenditures		
Credit Card Administration	CL+7 years	Records documenting administration of credit cards issued to individual agency staff or offices.		
Compliance – Non Financial Reporting	10 years	Official non-financial reports and studies issued by CAT to meet and comply with regulatory requirements*.	Actuarial Studies OSHA 300, 300a, 301 Reports / Logs Risk Management Reports (Federal OSHA, loss analysis, safety) Workers Compensation Reports (monthly, annuall)	
Compliance - Legal	Until Supersedes+10years	Forms and filings mandated by state and federal laws, including those related to economic interests of Officials designated in CAT' Conflict of Interest Code.		
Compliance – Public Information	10 years	Records requested by the public, required for provision to the public, and related inquiries.	Public Records Requests	
Fixed Assets – Inventory	LL+10 years	Records and information related to the ownership, purchase, sale, lease, or improvement of land, buildings, infrastructure, equipment and other capital and fixed assets owned or used by CAT	Asset Records, Depreciation, Disposal, surplus property, sales of obsolete equipment	
Grants and Funding	CL+5years + 2years	Documents the application, award administration, monitoring, reporting, and status of grants; Certifications and Assurances	Applications, Approval Letter, Authorizations, Awards and Notifications, Correspondence, Federal Grant, Grant Agreement, Grant Funding, Local Grant, Funding Local Grant, Reports, State Grant Tracking Reports	
Signature Authorizations	FR + 7 years	Records documenting the certification of employees who are authorized to sign fiscal and contractual documents.		
Garnishments	5 years	Records documenting the withholding of funds from an employee's wages at the request of the courts or state agency		
Periodic Tax Reports	5 years	Records documenting taxable and non-taxable income of an agency		
Unclaimed Pay Checks	2 years	Checks that remain unclaimed by employees		

RETENTION SCHEDULE

FINANCE (3 of 3)

Business Category	Retention Period	Description	Example Records	Comments
Procurement - Purchasing and Agreements, Awarded - General	CL+11 years + 2 years	Records and information created or retained in the requisitioning, purchasing, or contracting for the acquisition, development, improvement or maintenance of real property, facilities, or other infrastructure assets, between CAT and other parties. Includes: - Executed agreements - Terms and conditions and associated ancillary documents - Title Insurance agreements		
Procurement - Purchasing and Agreements, Awarded – Real Property and Facilities	CL+ 11 years + 2 years	Records and information created or retained in the requisitioning, purchasing, or contracting for the acquisition, development, improvement or maintenance of real property, facilities, or other infrastructure assets, between CAT and other parties. Includes: - Executed agreements - Terms and conditions and associated ancillary documents - Title Insurance agreements	Addendums Agreements Amendments Attachments / Exhibits Bids, Awards Certificates of Insurance Change Orders Contracts Correspondence Delivery/Receipt Records Disclosures Exhibits Invitations for Bid (IFBs) Leases Letters of Intent Maintenance Bonds Memoranda of Agreement (MOAs) Memoranda of Understanding (MOUs) Performance Bonds Proof of Insurance Certificates Purchase Orders Requests for Proposals (RFP) Requests for Qualifications Requests for Quotes (RFQ) Reports Scorecards Specifications Staff Reports Statements of Work (SOW) Surety Bonds (<i>bid bonds, payment bonds, performance bonds, ancillary bonds</i>) Warranties	
Procurement - Purchasing and Agreements, Cancelled	7 years	Records and information created or retained in the requisitioning of goods, services, or real property between CAT and other parties, but where the purchase order or contract was cancelled or unsuccessful.	Exhibits Invitation for Bid (IFB) Price Lists Quotations Requisitions Requests for Proposals (RFP) Requests for Qualifications Requests for Quotes (RFQ) Scorecards Specifications Staff Reports	
Procurement – Legal	LI+10 years	Legal Advertising; Proof of Publication for RFQ, RFP, IFB, Ads, etc.; Intergovernmental Agency Agreements, Contracts, Service/Supplies; Contracts, Equipment;		
Procurement – General	CL+10 years	Requisitions, Purchase Orders		

RETENTION SCHEDULE

BOARD ADMINISTRATION (1 OF 2)

Business Category	Retention Period	Description	Example Records	Comments
Authorization – Executive Director	FR+10 years	Authorizations for staff members to act on behalf of the Executive Director in the Executive Director’s absence. Authorizations for staff members to sign for grants, Certifications and Assurances, etc.	Authorization Forms (<i>from various Government entities, etc.</i>) Related Communication	
Agenda – Board & Committee	PR Permanent	Original Board and Committee agendas, special meeting notices		
Agenda Packets – Board & Committee	PR - Permanent	Complete agenda packets, by month		
Correspondence – Board	3 years	Correspondence from or to Board, not included in Board Packet		
Meeting - Legal Advertisement	PR-Permanent	Proof of publication for Public Hearings/meetings		
Minutes, Board Meetings	PR-Permanent	Official minutes and proceeding actions of Board		
Legislative - Board Official Meetings and Decisions	PR-Permanent	Official records of the CAT Board of Directors that document meetings, actions, and policies	Agendas Agenda Packets Attachments / Exhibits Bylaws Minutes Supplemental Meeting Handouts/ PowerPoint Presentations	
Legislative – Administrative Board Related Records	10 years	Documentation associated with administration, planning, and communication of the activities of the CAT Board of Directors	Action Logs (<i>distributed to staff</i>) / Follow-Up Agenda Planner Existing / Proposed Legislation (<i>County, State, Federal</i>) Public Comment (<i>speaker slips, public correspondence distributed to Board or Committees, public sign-in sheets</i>) Public Records Requests	
Legislative – Meeting Audio Records	1 year	Audio Recordings of CAT Board Official Meetings	Recordings – Board of Directors Regular Meetings	
Legal	Until Superseded + 2years	Legal Opinions – Confidential or Public Memoranda containing legal advice prepared by attorneys for CAT. Interpretations of the law and an agency’s compliance with the law by the Attorney General or other legal counsel	Memos Opinions - Covered by Attorney/Client Privilege Opinions - Public	
Legal Case Files	CL+6 years	Documents the work of the agency legal counsel in advising and representing the agency		
Open Records Act Requests and Correspondence	3years	Inquiries from members of the public requesting access to information under the Georgia Open Records Act.		
Records Schedule	Until Superseded + 5years	Copies of approved agency records retention schedules.		

RETENTION SCHEDULE

Board Administration (2 of 2)

Lobbyist Reports	LI+5 years	Documentation received, created, and/or submitted to Board	Reports from Federal and State Lobbyist – monthly updates	
Policies - Board Approved	Until Superseded + 5 years	All Agency Policies;	Policies, directives rendered by Board not assigned an action item number	
Executive Level Administrative	Permanent	This series includes the records of an agency's director, deputy director, and division directors. Records with historical value include memoranda, reports, and other documentation concerning the administration of policy, coordination of agency functions, and management of program activity. Records of a routine or non-substantive nature that do not document policy decisions or significant programmatic and functional activities.	Records that document policy, coordination of agency functions, and management of program activity: Permanent;	
Visitor Sign-in Logs	1 year	Visitor sign-in logs		

RETENTION SCHEDULE				
HUMAN RESOURCES (1 of 3)				
Business Category	Retention Period	Description	Example Records	Comments
Policies and Procedures	Until Supersedes+5 years	All documentation of CAT or department policy and procedures.	Correspondence Directives Guidelines Handbooks Policies Procedure Manuals Procedures Records Retention Schedule Rules / Regulations Standards Legislative Principles/Programs	
Legal - Claims, Litigation, Arbitration and Resolution	FR+6 years	Records and information created or collected to support CAT's position in actual or potential litigation or to otherwise evaluate actual or potential litigation relating to the organization, including claims, constituent complaints, grievances, worker compensation. Litigation includes third party litigation, government investigations, mediations, arbitrations, and other judicial or quasi-judicial proceedings, whether handled by the General Counsel or outside counsel on behalf of CAT.	Accident/ Incident Files - claim filed (<i>accident/incident reports, courtesy, related photographs/ video footage, supporting documentation</i>) ADA Case Files Amicus Briefs Case Correspondence Claims Complaints Contract Disputes Court Orders Demand Letters Discovery EEO Charges, Cases Evidence Exhibits Injury Reports Judgments Meet and Confer Pleadings (Affidavits, Depositions, Exhibits, Court Filings) Related Correspondence Releases Settlement Agreements Stipulations Subpoenas Unemployment Compensation Claims Unemployment Compensation Data, Weekly Earnings Data Worker Compensation Benefits (Claims, Orders, Reports, Rewards)	
New Hire Program	T+3 years	Work Authorizations - Confidential	Employment eligibility verification forms collected for active employees and supporting documentation regarding immigration status.	I-9 Documents
Employee Handbooks	Permanent	Guidelines created to explain the internal operations and procedures of the agency to a new employee		
Continuations of Insurance Benefits (COBRA) Records	6 years	Copies of notices required by COBRA; documentation that notices were received documentation of any circumstances in which COBRA is not offered due to gross misconduct		
Contracts, Employee	7 years after expiration	Service contracts between Agency head and government agency	Executive Director/CEO employment contract	
Retirement Incentive Program Records	6 years	Records documenting employees who elect for early retirement under government incentive programs		

RETENTION SCHEDULE

HUMAN RESOURCES (2 of 3)

AC =ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Employee Records – Confidential	LI+10 years	Documents related to paid employees (whether full or part-time), including but not limited to: - hiring documents (application, resume, job description) - promotion - demotion - transfer - layoff / recall / out-placement - retirement plan reporting and disclosure records (plan summaries, participant benefit statements, etc.) - termination / discharge / resignation - training (harassment/discrimination, ethics, fire extinguisher, first aid/CPR, safety, Title VI non-discrimination) - pay rates / other terms of compensation	Awards COBRA Correspondence Death Claims, Life Event Documents, Disciplinary Actions Employment Authorizations, Terminations, Confirmations, Status Changes, Coverage Changes Exit Form Incident Reports (non-injury or illness related incidents) Job Descriptions Leaves of Absence Personnel Files (Personnel Action Form, Master log records, Onboarding documentation, Compensation, etc.) PARS Plan Summaries Participant Benefit Statements Policy Acknowledgements Recruitment (Applications, Applicant Tracking, Background Checks, Interview Notes, Job Postings, Board & Executive Candidates) Timesheets Training certificates	
Personnel - General	LI+10 years	Confidential records and information related to Human Resources activities not covered by other record categories.	Classification Studies & Job Descriptions Compensation Studies & and Salary Schedules	
Benefit Plans	T+6 years	Plans established to provide employee benefits, including changes to those plans and associated administrative documents.	Correspondence, Dental, Life Insurance, Medical Reporting, Vision, Workers Compensation	
Employee Medical Records - Confidential	LI+10 years	Documents related to paid employees (whether full or part-time), including but not limited to: - medical records, including exposure and drug screens (includes records subject to HIPAA requirements) - workers compensation	Employee Injury / Accident Reports Exposure Monitoring FMLA Other Medical Leaves of Absence Hazardous Exposure Incident Reports (Occupational Illness or Injury) Medical Waivers and Changes Pre-employment Physical Workers Compensation (claims, claim logs, incident/accident reports) Health and Welfare Benefit Plan Documents (kept in personnel file if no medical information is included)	

RETENTION SCHEDULE

HUMAN RESOURCES (3 of 3)

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Business Category	Retention Period	Description	Example Records	Comments
Executive Level Administrative	Permanent	This series includes the records of an agency's director, deputy director, and division directors. Records with historical value include memoranda, reports, and other documentation concerning the administration of policy, coordination of agency functions, and management of program activity. Records of a routine or non-substantive nature that do not document policy decisions or significant programmatic and functional activities.	Records that document policy, coordination of agency functions, and management of program activity: Permanent;	
Training Records	5 years	Records documenting attendance and course content for continuing education training.		
Position Classification Materials	CL+4 years	Records documenting job requirements, description, and salary range.		
Correspondence, Administrative	Permanent	This series includes communications received or sent that document significant events and/or the development of administrative structure, policy, procedures, and the historical development of the office		
Correspondence, General	5 years	This series includes correspondence that documents formal decisions regarding routine matters.		
Leave Donation Records	CL+1 year	Records documenting the donation of leave by employees to assist an individual who must be absent from work for an extended period of time due to illness.		
Leave Records	CL+3years	Records documenting the donation of leave by employees to assist an individual who must be absent from work for an extended period of time due to illness		
Job Recruitment Records	2 years	Records documenting efforts to advertise positions and attract qualified personnel.		
Equal Employment Opportunity Commission and GA Commission of Equal Opportunity Complaints	FR+3years	Records documenting charges of discrimination filed against an agency. Reports classifying employees by race and gender that document compliance with EEOC rules.		
Affirmative Action Records	Permanent	Records documenting an agency's compliance with the requirement of the EEOC		
Employee Hazardous Materials Exposure Monitoring Records	30 years	Records monitoring the exposure to hazardous materials by employees.		
Employee Medical Files, Toxic/Hazardous Substance Exposure	T+30 years	Documentation of employee exposure to hazardous materials.		
Employee Grievance Action Case Files	CL+3 years	Resolution of employee complaints against supervisor or other employees.		

RETENTION SCHEDULE

IT INNOVATIONS (1 of 1)

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Business Category	Retention Period	Description	Example Records	Comments
Information Technology - Application, System Development and Maintenance	LI+5years and at least 2 backup cycles	Technical documentation related to development of CAT technology processes, applications, or systems, as well as conversions, changes or modifications to existing applications or systems.	Backups (Security, System) Business, Functional Requirements End User Documentation, User Manuals Hardware (licenses, purchases, maintenance, upgrades) Hardware Configurations Network Circuits Inventories Network/Equipment Control Support Documentation (Service Histories, Site Visit Reports, Trouble Reports) Program Listings Software (<i>licenses, purchases, maintenance, upgrades</i>) Source Code Support Documentation (Logical & Physical Architectural Diagrams, Specifications, Systems Support Materials) System Documentation (Codebooks, Record Layouts, Reference Guides, Specifications) System Test Files System, Application Maintenance Documentation (Hardware/Operating System Requirements, Monitoring Logs, Operating Manuals) Telecommunications System (Telephones, Phones)	

RETENTION SCHEDULE

COMMUNICATIONS (1 of 1)

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Business Category	Retention Period	Description	Example Records	Comments
Public Information	PR-Permanent	<p>Historical Documents, Events, Memorabilia, Collections, Artifacts, Schedules, Brochures, Tickets/Passes</p> <p>Records and information documenting the history and significant milestones of CAT; and publications providing information on routes, schedules and services provided by CAT.</p>	<p>Brochures</p> <p>Bus Schedules</p> <p>Executive, CAT Official Communications, Speeches, Videos Historical Events, Artifacts, Architecture</p> <p>Mission Statement</p> <p>Artwork, Pictures, Video Collections (logos, identity/branding)</p> <p>Organization Charts</p> <p>Significant News Clippings, Releases (regarding agency milestones)</p> <p>Transit Services Maps Transit Tickets and Passes</p>	
Public Notices – Operations	PR-Permanent	Records documenting compliance with laws requiring public notice of CAT activities	<p>Proof of Posting, Affidavits of Publication/Legal Notices; Solicitation Advertisement, Service Changes, Fare Structure Changes, Public Hearing Notices</p>	
Community Outreach/Public Relations	PR-Permanent	<p>Community Outreach, Media and Public Relations</p> <p>External-facing communications, advertising and press relations materials, including documentation of outreach activities/events held in cooperation with or for the benefit of the customer service community.</p>	<p>Bus Advertising Marketing (media, mailers, media packets, mailers, promotional items)</p> <p>Articles</p> <p>Media (Press Releases, Media Packets) Events (<i>community outreach, special</i>) Mailers</p> <p>Media Packets Newsletters</p> <p>Promotional Items Rider Relief</p> <p>Seat Drops Subsidy Programs</p>	

RETENTION SCHEDULE

OPERATIONS (1 of 3)

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Business Category	Retention Period	Description	Example Records	Comments
Customer Service	LI+10 years	Documentation regarding customers and passengers, including participation in CAT programs, and customer complaints or issues and the actions taken to address and resolve them.	Customer Correspondence Reduced Fare Applications	
ADA – Mobility	T+10 years	Paratransit Application completed by Applicant Paratransit Application completed by MD licensed health care professional/application process Determination letter of eligibility for access to CAT Mobility	Paratransit/Mobility Eligibility List, No Show Letters, Reduced Fare Applications, etc.) Issues Log Passenger Information	
Facilities - Building and Property Maintenance	PR-Permanent	Includes routine, preventative, and reactive maintenance activities for CAT facilities and non-vehicle equipment	Checklist, Preventative Maintenance Log, Repair Orders, Replacement Schedules, Work Orders	
Maintenance - Facilities/Building and Property Maintenance	PR-Permanent	Records and information regarding the structure of CAT physical buildings and facilities	As-Built Blueprints Certificates (compliance, occupancy) Construction Records Easements Electrical Wiring Schematics Facility Key and Fob Log Facility Key Request Forms Floor Plans Property Inventory Storm Drains/Sewers	
Safety - Business Continuity	Until Superseded+10 years	All documentation of CAT activities for dealing with disasters and/or system failures	Business Continuity Plans Disaster Preparedness Disaster Recovery Plan Drill Records Emergency Contact Lists, Employee Lists, Roster of Workers Emergency Evacuation Procedures Emergency Operations Center Emergency Preparedness Emergency Response Emergency Services Hazardous Materials Response Planning Telephone Trees	
Transit Operators Compliance Records	Until Superseded+10 years	Reports, logs and other information provided by transit operator to document compliance with CAT requirements and used in compiling reports prepared for funding entities.	Monthly Reports Key Performance Indicators	

RETENTION SCHEDULE

OPERATIONS (2 of 3)

AC=ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Maintenance – Fleet Management	LI+5 years	Records related to the purchase and management of vehicles / buses owned or used and maintained by CAT.	Accident Logs Incident Logs Acquisitions (<i>purchases</i>) Buses Energy Logs Fuel Logs Mileage Reports Manuals Motor Vehicle Records and Reports Preventive Maintenance Reports Registrations, Operating Permits Maintenance / Repair (<i>orders, requests, labor costs, preventive</i>) Service Calls Smog Inspections Vehicle Certificates of Insurance Vehicle Health Reports Vehicle Inspections Vehicle License Plate Records Vehicle Maintenance History Vehicle Ownership / Title Warranties	
Maintenance – Hazardous Waste, Monitoring and Remediation	T+30 years	Planning, monitoring and contingency/emergency action plans for hazardous waste, emergency and spill response, exposure emergencies, notifications and response; environmental action plans and supporting documentation; hazardous communications plans, including labeling, MSDS controls, training programs and procedures.	Chemical Use Reports Form Electronic Waste (E-Waste) HazMat Emergency Response Programs Employee Hazardous Chemical Exposure Hazardous Material Incident Reports Hazardous Substances Shipping Manifests Hazardous Waste Hazardous Waste Manifests Herbicide Application Permits Material Safety Data Sheets (MSDS) Proposition 65 Monitoring Site Mitigation Toxic Substance Inventory	
Safety – Facility Inspections	7 years	Records of inspections of CAT facilities, equipment, and working conditions to ensure compliance with regulatory requirements and to identify unsafe conditions and work practices.	AVAQMD Backflow Prevention Devices OSHA Elevator Inspections Field Safety Audits Fire Extinguishers Fire Marshal Inspections Lift Certifications OSHA Inspections	
Safety – Ferries; Coast Guard Inspections	??? [Need to check federal regs to see how long these need to be retained]			
Safety – Security Access Controls Facilities	5 years	Records of actions taken to ensure the security of CAT facilities, including video recordings made from cameras installed on CAT premises.	Daily Security/ Activity Logs Security Camera Footage Security Plans Video Recordings Visitor Security / Access Logs	

Safety – Surveillance Videos – Onboard Buses	30 days FR+2 years	If no known accidents - Video recordings made on each bus, during each shift, and recorded continuously. Known Accidents/Incidents	Onboard Surveillance System	
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RETENTION SCHEDULE

OPERATIONS (3 of 3)

AC =ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Safety – System Security	Permanent	Records associated with mandated safety and security plans	Field Services Safety Audits Hazard Mitigation Plan Safety Meetings Safety and Security Officer Certification Safety and Security Plan Mutual Assistance Agreements	
Safety – Risk Management/Incidents	FR+7 years	Records of accidents and incidents that do not involve injuries to employees or contractors. NOTE: If a claim is filed, see Claims, Litigation, Arbitration and Resolution, above.	Accident Files - no claim filed (<i>accident reports, courtesy cards, photographs, supporting documentation</i>) Arson / Graffiti Incident Reports, Videos Property Damage Theft Vandalism	
Safety – Risk Management/Insurance Coverage	LI+7 years	Records detailing CAT's general coverage against property damage and liability, including renewal submission information, insurance quotes, & broker correspondence.	Binders / Information / Correspondence / Certificates of Insurance Completed Applications Insurance Policies (<i>disability, flood, liability, property</i>) Insurance Quotes	
Service Delivery Reports	LI+7 years	Documentation associated with preparation, delivery and publication of transit program reports, whether daily, weekly, monthly, quarterly, semi-annual, annual, biennial or nonrecurring.	Accidents, Safety and Security Reports Passenger Survey Reports Hours Report Mileage Report NTD (National Transit Database) Reports Ridership Report Survey Trip Sheets	

RETENTION SCHEDULE

PLANNING (1 of 2)

AC =ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Project Management - Construction, Engineering and Infrastructure	CL+11 years	Records and information related to the administration, analysis, design, development, planning, construction and maintenance, capital improvement (CIP) and engineering projects for CAT facilities and infrastructure.	Assessments Bids Blueprints Billings Capital Improvement Projects (CIP) (<i>drawings, maps, plans</i>) Certifications (<i>daily reports</i>) Contract Schedules Contractor Documentation (Payroll, Pay Estimates, Prevailing Wages, Itemized Pay Sheets, Labor Compensation, Statement of Working Days) Construction Daily Reports Correspondence Encroachment/Right of Way (ROW) Permits, Certificates Environmental Impact Reports / Statements / Assessments Estimates / Budgets Field Inspections Final Improvement Plans Grading (<i>cut sheets, permits, erosion control plans</i>) Insurance Certificates Land Surveys (<i>project built</i>) Materials Testing Reports Notices of Completion Notices to Proceed Public Notices Request for Final Inspection RFIs & Responses Specifications Submittals	
Project Management – Projects Not Acquired	11 years	Records and information associated with projects that did not move forward.	Environmental Reports Land Surveys (<i>project not built</i>) Preliminary Studies Project Assessments Title Reports	
Program Management – Transportation Planning	PR-Permanent	Documents regarding fares, riders, ridership, routes, monitoring of existing services and service development, including reports that compile information from multiple sources.	Fare Policy Mobility Management Routes and Schedules Route Statistics Service Changes (Routes, Outreach) Sign Policy Strategic Transit Planning Studies Surveys Title VI Reporting TDA Article 8 Plans	

RETENTION SCHEDULE

PLANNING (2 of 2)

AC =ACTIVE AU=AUDIT AY= AWARD YEAR CL=CLOSED FR=FINAL RESOLUTION FY=FISCAL YEAR LA=LAST ACTIVITY LI=LIFE (of contract program, asset) PR=PERMANENT

Business Category	Retention Period	Description	Example Records	Comments
Project Management - Project and Reference Data	CL+11 years	Records documenting activities related to specific projects or subjects (unrelated to construction, facilities/ infrastructure). Documents and materials retained for ongoing personal reference or ongoing research purposes not covered in a more specific process related series.	Consultants Data Processing Subject Files (Correspondence, Reference Publications, Reports) Extracted Data Summaries Forms Project Files Project/Program Plan Project Reporting Project Studies Subject Files Templates & Letterhead Working Files Census Data Data Processing Subject Files (Correspondence, Reference Publications, Reports) Environmental Regulatory Data Extracted Data Summaries Records Inventory	
Federal and State Grant Project Files	PR - Permanent	Records documenting federal and state-funded grant projects	Final Narrative Summary	

Attachment B

Storage Control No.:		
CAT Record Storage Label		
Department:	Date:	
Type of Document (use the terms from the Records Retention Schedule)		
DESTRUCTION DATE:		
Manager (print):	Manager (sign):	Date:
Division Chief (print):	Division Chief (sign):	Date:
Chief of Staff (print):	Chief of Staff (sign):	Date:

Storage Control No.:		
CAT Record Storage Label		
Department:	Date:	
Type of Document (use the terms from the Records Retention Schedule)		
DESTRUCTION DATE:		
Manager (print):	Manager (sign):	Date:
Division Chief (print):	Division Chief (sign):	Date:
Chief of Staff (print):	Chief of Staff (sign):	Date:

Attachment C

RECORDS DISPOSITION ORDER					NO.
					PAGE OF PAGES
1. Department Name and Number			2. Department Contact (Name and Telephone Number)		
			() - Ext.		
3. NOTICE OF INTENTION: The scheduled records listed in Item 5 are to be disposed of in the manner checked below (specify only one). <input type="checkbox"/> a. Destruction <input type="checkbox"/> b. Microfilming and Destruction <input type="checkbox"/> c. Other _____					
4. SUBMITTED BY: I hereby certify that the records to be disposed of are correctly represented below, that any audit requirements for the records have been fully justified, and that further retention is not required for any litigation pending or imminent.					
_____ Signature		_____ Name and Title		_____ Date	
5. LIST OF RECORD SERIES					
a. Storage Control No.	b. Item No.	c. Title/Record Type	d. Inclusive Dates	e. Volume In Cubic Feet	f. Disposition <u>Action and Date</u> Completed After Authorization
6. DISPOSAL AUTHORIZATION: Disposal for the above listed records is authorized. Any deletions or modifications are indicated.			7. DISPOSAL CERTIFICATE: The above listed records have been disposed of in the manner and on the date shown in column g.		
_____ Chief of Staff (Records Management Officer)			_____ Signature		
_____ Date			_____ Date		
			_____ Name and Title		
			_____ Witness		



CHATHAM AREA TRANSIT

900 East Gwinnett Street · Savannah, GA 31401

Board Action Item Report and Staff Summary

SUBJECT: Record Retention Schedule and Management Policy	AGENDA NO: 2023-20-041
DESCRIPTION: Revised Records Management Policy	
ACTION REQUEST: <input type="checkbox"/> Approval <input type="checkbox"/> Review Comment <input type="checkbox"/> Information Only <input type="checkbox"/> Other	

RECOMMENDATION:

Staff is requesting Board approval of its revised Records Retention Schedule and Management Policy.

ISSUE/BACKGROUND:

At the October 27, 2020 meeting, the Chatham Area Transit (CAT) Board of Directors approved the Records Management Policy to replace the Confidentiality/Open Records Policy. The Confidentiality/Open Records Policy was replaced because it did not cover the retention schedule. CAT revised the policy in 2020 to cover the missing schedule by including a general print of the University System of Georgia Archives – Local Government Records Retention Schedules.

However, during a recent Financial Management Oversight (FMO) review of the agency records revealed that there was a deficiency in one of the category of records. It was recommended by FTA to “update the records retention schedule to include the minimum number of years for retaining award-related documents as required by 2 CFR 220.334; store these policies and procedures in a repository that can be readily accessible if requested by auditors or other reviewers; and provide a copy of these policies and procedures to FTA Region IV for review.”

Other commentary was provided by FTA that “the records retention schedule was very thorough but did not include specific reference to retention periods of FTA grant related documents. We did note that the records retention schedule does state that CAT retains records as required by law, but did not specify the number of years of retention as required by 2 CFR 200.334.”

These types of regulated reviews are appreciated as CAT continues to improve in its everyday business processes. In response to FTA, CAT committed to updating the existing records retention policy to document specified period of time for records retention that complies with the recommendation

DISCUSSION:

In determining the recommended retention of such records, Staff reviewed copies of other agency retention schedules, as well as CAT’s audit requirements, business necessities, and legal obligations. It was determined that business necessity requires us to retain records related to grant for a minimum of three years after its inactive period.

The Records Retention Schedule is an important part of a public records management program. It outlines the policy designed to consistently manage government information, documenting key agency decisions and events. Recordkeeping requirements applied to Federal records will prevent loss of institutional knowledge, provides preservation of historical record, and are of critical importance in ensuring that the organization continues to function effectively and efficiently.

Each department is responsible for establishing effective controls over all records and nonrecord materials in its custody. This retention schedule is organized into broad categories that represent high-level business functions, which may be handled, by one of more departments. It is used to outline how long records shall be retained by CAT and has been prepared in compliance with federal and state law. Keeping CAT’s particular business necessities in mind, CAT may dictate a longer retention span that is required by law for specific records.

The Records Retention Schedule is flexible in nature, as over time, laws and/or business practices may change which may impact the retention requirements or need for those records. It is recommended that such minor changes to the Records Retention Schedule be made by request of the Board Administrator, approval of Legal Counsel, and concurrence of the Executive Director.

COMMITTEE DISCUSSION (2/21/2023)

Acknowledging the excellent feedback provided by committee members during the February 21, 2023 committee meeting, staff would like to note additional information for clarification purposes.

Response to Question or Comment 1 - In the new proposed retention schedule draft, CAT provided language with the intention to address FTA’s concerns regarding the specific retention period for records pertaining to awards and grant related documents by providing language in the retention schedule. However, staff did not include those specifics within the policy. A sample is provided below (pulled from the proposed retention schedule):

Finance Section (page 2 of 15)

Grants and Funding	CL+5years	Documents the application, award administration, monitoring, reporting, and status of grants; Certifications and Assurances	Applications, Approval Letter, Authorizations, Awards and Notifications, Correspondence, Federal Grant, Grant Agreement, Grant Funding, Local Grant, Funding Local Grant, Reports, State Grant Tracking Reports	
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Finance Section (page 3 of 15)

Procurement - Purchasing and Agreements, Awarded - General	CL+11 years + 2 years	Records and information created or retained in the requisitioning, purchasing, or contracting for the acquisition, development, improvement or maintenance of real property, facilities, or other infrastructure assets, between CAT and other parties. Includes: - Executed agreements - Terms and conditions and associated ancillary documents - Title Insurance agreements		
Procurement - Purchasing and Agreements, Awarded – Real Property and Facilities	CL+ 11 years + 2 years	Records and information created or retained in the requisitioning, purchasing, or contracting for the acquisition, development, improvement or maintenance of real property, facilities, or other infrastructure assets, between CAT and other parties. Includes: - Executed agreements - Terms and conditions and associated ancillary documents - Title Insurance agreements	Addendums Agreements Amendments Attachments / Exhibits Bids, Awards Certificates of Insurance Change Orders Contracts Correspondence Delivery/Receipt Records Disclosures Exhibits Invitations for Bid (IFBs) Leases Letters of Intent Maintenance Bonds Memoranda of Agreement (MOAs) Memoranda of Understanding (MOUs) Performance Bonds Proof of Insurance Certificates Purchase Orders Requests for Proposals (RFP) Requests for Qualifications Requests for Quotes (RFQ) Reports Scorecards Specifications Staff Reports Statements of Work (SOW) Surety Bonds (<i>bid bonds, payment bonds, performance bonds, ancillary bonds</i>) Warranties	

Planning Section (page 15 of 15)

Federal and State Grant Project Files	PR - Permanent	Records documenting federal and state-funded grant projects	Final Narrative Summary	
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Response to Question or Comment 2 – Staff will continue to work with legal to identify best format use for retaining certain records and will update the Board by the next annual revision, identifying the format/media type, (Ex: paper, electronic, digital, website, etc.). CAT is committed to choosing the best format suited for the need I a modernized record-keeping management system.

FINANCIAL IMPACT:

There is no fiscal impact associated with this item. Active records are stored at CAT’s office for no additional storage cost and CAT pays a minimal monthly fee to store inactive records at off-site storage.

NEXT STEPS:

- CAT will submit revised approved policy and schedule to FTA for final review.

ATTACHMENTS:

- Redlined Records Management Policy Draft
- Proposed Retention Schedule Draft

COMMITTEE ASSIGNMENT:

Financial Services Audit/Compliance Committee

PROPOSED MOTION:

Move to: approve the revised Records Management Policy and new Retention Schedule, as shown in Attachment A and to authorize that such minor changes to the retention schedule be made by the Board Administrator, through the approval of Legal Counsel, and concurrence of the Executive Director as business practices may change that may impact the retention requirements or need for such records.

Prepared By: Beverly Dumas, Board Administrator
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Reviewed by: Stephanie Cutter, Chief Financial Officer
Stephanie.cutter@catchacat.org

Reviewed by: Faye DiMassimo, Executive Director/CEO
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Deidrick Cody Board Chairman

Motioned by: Director Helen Stone

Seconded by: Director Bobby Lockett

Approved by: 7-0-*2^{NP}

Date