HAVRE DE GRACE HOUSING AUTHORITY

A Resolution of the Board of Commissioners Approving and Adopting the Records Retention and Disposal Policy

WHEREAS the U.S. Department of Housing and Urban Development ("**HUD**") performed a comprehensive compliance review of the Havre De Grace Housing Authority ("**HDGHA**") and set forth the findings in the report dated June 13, 2025 (the "**Report**"); and

WHEREAS the Report included Finding GOV 13, thereby requiring HDGHA to adopt and implement a document retention policy to provide for maintaining and disposing of HDGHA records in accordance with HUD requirements; and

WHEREAS the Records Retention and Disposal Policy (the "**Records Policy**"), which includes a schedule establishing the time to dispose of HDGHA records, is attached as **Exhibit A** and complies with HUD requirements.

NOW THEREFORE, BE IT RESOLVED by the Board that:

1. The Records Policy attached as **Exhibit A** is hereby approved and adopted.

2. The Managing Agent for HDGHA, or designee, is authorized to perform all appropriate acts and execute all appropriate documents to carry out this resolution consistent with its terms for implementation of the Records Policy.

[Signature page follows]

Passed, adopted and approved by the Board on June 8, 2026.

Michele Ball, Chair

George Kasnic, Vice Chair

Sharon Jacobs, Commissioner

Carrie Parsons, Commissioner

Dawn Nowak, Commissioner

EXHIBIT A

Records Retention and Disposal Policy

HAVRE DE GRACE HOUSING AUTHORITY

RECORDS RETENTION AND DISPOSAL POLICY

1. Purpose

This Records Retention and Disposal Policy (the "**Records Policy**") is provided to ensure that the Havre de Grace Housing Authority ("**HDGHA**") will properly manage, store, maintain, and dispose of agency records in compliance with the requirements of the United States Department of Housing and Urban Development ("**HUD**"), the Maryland Public Information Act and the legal obligation for preservation of evidence. HDGHA records consist of documented information that sets forth the agency's functions, policies, programs, decisions, procedures, including legal and fiscal rights and obligations, and all essential transactions, which are documented in every format, including, but not limited to paper and digital, tapes, photographs, film or sound recordings; or data- or image-processed documents. If the documentation (regardless of format) is not related to HABC business, it not a record and should be disposed of immediately (such as an e- mail from a friend asking whether you would like to meet for lunch).

2. Staff Covered by this Policy

The requirements in this Records Policy apply to all HDGHA employees

3. Definitions

(a) Custodian: The authorized HDGHA staff who have physical custody and control of a record that is created or maintained by HDGHA.

(b) Disposition: The approved destruction of a record.

(c) Record: Any file, document, report, email, photograph, film or sound recording created or maintained by HDGHA. A record can be in a paper or a digital format created or maintained by HDGHA.

(d) Retention Period: The length of time HDGHA must keep a record. Certain records must be maintained indefinitely.

4. Responsibilities

(a) The Executive Director or Managing Agent for HDGHA (together, the "**Director**") is the official custodian for HDGHA records and is responsible for ensuring compliance with this Records Policy and retention schedule. The Director, or designee, is responsible for approving the disposition or destruction of an HDGHA record.

(b) The Asset Manager is the custodian responsible for managing and maintaining all public housing applicant records and documents for the tenant files, including but not limited to waiting list files, recertifications, HUD forms, HQS/NSPIRE inspection records, work orders, and building documentation.

(d) The FSS Coordinator is the custodian responsible for managing and maintaining all FSS case management files and escrow documents.

5. Changes to Policy and Procedures

Changes to this Records Policy must be approved by the HDGHA Board of Commissioners. Attached to this Records Policy is a Record Retention Schedule (the "**Schedule**"), which may be changed with approval from the Director, or designee, as long as the retention periods in the Schedule comply with the Records Policy and all applicable laws, regulations, guidelines, policies and procedures or the terms and conditions of any grant award or contract. This Records Policy and the Retention Schedule will be revised as necessary upon changes in HUD requirements and applicable laws. The Records Policy and Retention Schedule will be reviewed every two (2) years to ensure compliance with applicable requirements.

6. Management of Digital and Electronic Records; Management of Criminal Records and Records Containing Personally Identifiable Information

6.1. HDGHA digital and electronic records must remain on the agency's network. Staff are prohibited from copying or downloading HDGHA digital and electronic records on personal devices, such as hard drives or a personal portable data storage device, such as a USB drive aka thumb drive. Emails containing HDGHA records must be moved to the proper digital folder.

6.2. Pursuant to 24 CFR 5.903(g), HDGHA must ensure that any criminal record that it receives from a law enforcement agency is:

(i) Maintained confidentially;

(ii) Not misused or improperly disseminated; and

(iii) Destroyed, once the purpose(s) for which the record was requested has been accomplished, including expiration of the period for filing a challenge to HDGHA's action or the final disposition of any litigation involving the criminal record.

6.3. Records containing personally identifiable information must be managed in accordance with the Privacy Policy.

7. Record Destruction

Records may only be destroyed after their retention period expires and with approval from the Director, or designee. Records that have been retained for the required minimum period may nevertheless be retained by HDGHA for a longer period of time, at the direction of the Director, designee or HDGHA legal counsel, such as records involving litigation, HUD or HDGHA audits, or requests under the Maryland Public Information Act.

Paper records must be destroyed only by cross-cut shredding or micro-cut shredding techniques. Staff must never throw records in regular trash.

Digital and electronic records must be destroyed in a secure manner, beyond simple deletion to ensure that the digital or electronic record cannot be recovered.

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RECORDS RETENTION SCHEDULE

A. HUD EIV Requirements

HDGHA must follow HUD's Enterprise Income Verification ("**EIV**") security and retention periods, as follows:

1. Keep EIV Income and Income Discrepancy Reports for 3 years after the family moves.
2. Keep EIV Summary and Master Files for 3 years.
3. Store EIV files in a locked file cabinet with access limited to authorized EIV users only.
4. Destroy EIV documents by cross-cut shredding only.
5. EIV information may NOT be emailed, copied, or stored on personal devices.
6. Staff must complete EIV annual security training and sign the HUD Rules of Behavior.

B. Administrative Records

The retention periods for the HDGHA administrative records are as follows:

1. HDGHA Board of Commissioners minutes and resolutions: Retain permanently.
2. HDGHA Annual, Five Year and Capital Fund Plans: Retain permanently.
3. Agency policies and procedures: Retain permanently or until replaced.
4. Annual agency budgets: 7 years
6. General correspondence: 3 years

C. Public Housing Tenant Files

The retention periods for the documents in the public housing tenant files are as follows:

1. Tenant application, intake packet, lease, recertifications: 3 years after move-out
2. 50058 forms: 3 years
3. Rent calculation and income verification documents: 3 years
4. Grievance complaint and decisions: 3 years after closure
5. Eviction files: 5 years
6. Waiting list documents: 3 years after leased or inactive

C. FSS Program Files

The retention periods for the FSS program documents are as follows:

1. FSS enrollment packet: 3 years after completion of, or exit from, the program.
2. Individual Training and Services Plan, case notes, and progress reports: 3 years after completion.
3. Escrow records: 3 years after final disbursement.

D. Maintenance and Property Records

The retention periods for the maintenance and property records are as follows:

1. Work orders: 3 years from completing the work.
2. Unit inspection files: 3 years from completion of the inspection.
3. Building plans/blueprints: Retain permanently.
4. Modernization project files: 5 years after project completion.

- NSPIRE/REAC inspection reports — 3 years

E. Procurement and Financial Records

- Procurement records (solicitations, purchase orders, contracts): 3 years after final payment under the contract.
- Accounts payable/receivable records: 7 years
- Annual financial reports: 7 years
- Financial audits: 7 years