

Yellowstone Country Assistance Network's Record Retention Procedures

The Yellowstone Country Assistance Network takes seriously its obligations to preserve information relating to litigation, audits, and investigations.

The information listed in the retention schedule below is intended as a guideline and may not contain all the records the Organization may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the President.

From time to time, the President may issue a notice, known as a "legal hold," suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the President.

File Category	Item	Retention Period
Corporate Records	Bylaws and Articles of Incorporation	Permanent
	Corporate Resolutions	Permanent
	Board Agendas and Minutes	Permanent
	Conflict of Interest Statements	4 years
Finance and Administration	Financial Statements	7 years
	Payroll Records	7 years
	Check Register and Checks	7 years
	Bank Deposits	7 years
	Chart of Accounts	7 years

	General Ledger and journals including reconciliations	7 years
	Equipment files and maintenance records	7 years
	Contract and Agreements	According to contract or 7 years whichever is first
Insurance Records	Policies	Permanent
	Accident Reports	7 years
	Safety (OSHA) reports	7 years
	Claims (after settlement)	7 years
Real Estate	Leases (expired)	7 years after all obligations end
Tax	IRS exemption determination and related correspondence	Permanent
	IRS forms 990's	7 years
Human Resources	Employee Personnel Files	Permanent
	Employee Handbooks	Permanent
	Workers comp claims (after settlement)	7 years
	Employee Orientation and Training Materials	7 years after use ends
	Withholding Statements	7 years
	Timecards	3 years
Technology	Software licenses and support agreements	7 years after obligations ends

Yellowstone Country Assistance Network maintains and retains all financial and program records, supporting documents and statistical and other records pertinent to our grants.

CSBG records are maintained for six (6) years or the specific period in the CSBG contract

Record Keeping: the Board is responsible for the oversight of CSBG record keeping practices.

- ✓ All CSBG client files and/or reports containing names or personal information of clients are kept in a locked office in a locked file cabinet. The Executive Director is the only person with a key to these files.
- ✓ All CSBG grant files are maintained in binders by fiscal grant year for a period of six (6) years.
- ✓ All persons applying for CSBG grants-in-aid are provided with written notification of approval or denial of services. A copy of such written notification is maintained in the client file. Any client denied services is notified of the YCAN appeal process.
- ✓ A copy of check receipts and invoices are located in each client's file, all checks can be traced back to the corresponding bank statement.
- ✓ CSBG Client files are maintained in a locked file cabinet for a period of 6 years, according to the grant contract.

- ✓ Electronic Documents and Records: Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

- ✓ Business Receipts Bank Statements & Reconciliations: Are filed in binders labeled (1-11) #11 being the most recent. Older receipts before QuickBooks are filed by vendor in the office file cabinet. The Board reviews the Business Receipt Binder and each board meeting.

- ✓ Each grant has its own financial record binder.

Physical Safeguards Established to Maintain Records

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CSBG records are maintained for six (6) years (or the specific period in the CSBG State Plan):

Record Keeping: The Board is responsible for the oversight of CSBG record keeping practices.

- ✓ All CSBG client files and/or reports containing names or personal information of clients are kept in a locked office in a locked file cabinet. The executive director is the only person with a key to these files.

- ✓ All CSBG grant files are maintained in binders by fiscal grant year for a period of six (6) years, or when the contract states.
- ✓ All persons applying for CSBG grants-in-aid are provided with written notification of approval or denial of services. A copy of such written notification is maintained in the client file. Any client denied services is notified of the appeal process.
- ✓ A copy of check receipts and invoices are located in each client's file, all checks can be traced back to the corresponding bank statement.

Client Records: Client records are confidential and must be stored in a secure locked file cabinet in a locked office. Client files are located at the business office in a locked file cabinet. Files must be kept locked. Each grant has different retention guidelines, for CSBG client files must kept for 6 years after the grant contract ends. Newer CSBG grants have a 3-year retention period. When destroying files all client information must be shredded.

1. 2011 Client Files can be destroyed October 1, 2017
2. 2012 Client Files can be destroyed October 1, 2018
3. 2013 Client Files can be destroyed October 1, 2019
4. 2014 Client Files can be destroyed October 1, 2020
5. 2015 Client Files can be destroyed October 1, 2021
6. 2016 Client Files can be destroyed October 1, 2022
7. 2017 Client Files can be destroyed October 1, 2023

Grant Records: CSBG Grant Binders are filed in large 3" Binders labeled by grant fiscal year located in a bookcase at the business office. Each binder has a copy of the, budgets, and a copy of the contract and MOU from subcontracted agencies. YCAN must also keep records of monthly reports which are stored in separate binders by grant fiscal year in the same bookcase. IS reports are also stored in binders by fiscal year in the same bookcase. There are CSBG 10% grants in smaller binders that must be kept until the date indicated on the binder. Original grant contracts are stored in the (Business Office File Cabinet Corporate Files)

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5. 2015 CSBG Files can be destroyed October 1, 2021
6. 2016 CSBG Files can be destroyed October 1, 2022
7. 2017 CSBG Files can be destroyed October 1, 2023

Subcontractor Required CSBG Documentation: All service providers receiving CSBG Block grant funding will be mandated to have the following documentation for every client served with CSBG grant funding. If an audit occurs and the sub-contracted agency is found not to have the documentation in their records the sub-contracted agency will be responsible to repay the grant funds to the State of Wyoming and holds Yellowstone Country Assistance Network harmless for repaying such CSBG Grant funding.

Records under audit, involved unresolved findings, appeals or litigations must be held until the action is completed. These records include all of the grant activities for each year that funding was awarded. Following is suggested format for organization of this file.

- ✓ Applications
- ✓ Correspondence
- ✓ Award Documents
- ✓ Grant Adjustments
- ✓ Financial Information – Vouchers, invoices, receipts, canceled checks, and payment request forms
- ✓ Monthly Expenditures & Cash Reconciliation Reports
- ✓ Monthly WyoROMA reports
- ✓ Procurement Information – Bid Specifications and Competitive Bids
- ✓ Equipment Inventory List/Maintenance

The starting date for the six-year retention period is dependent on the type of record. Following is a schedule for specific records:

- General Records – Date of submission of the final or annual expenditure report.
- Equipment Records – Date of transfer, replacement, sale or disposal of item.
- Cost allocation (budget plans) – Date of submission of budget through the close of the fiscal year covered by the budget plan.
- Income Records – The period of the grantee fiscal year in which the income is used.

All YCAN Administered CSBG grant records are located in the main business office at 335 North Gilbert, Powell, Wyoming 82435.

- All CSBG grant applications are filed in binders by Fiscal Grant Year.
- Grant binders include the Grant Application, sub-recipient grant applications, contracts, monthly reports, and grant correspondence.
- All Yellowstone Country Assistance Network CSBG financial reports are located in a file cabinet at the main office.

- Backups of all grant files are located on the YCAN computer under CSBG. Another backup copy of the files is located in the office safe.

Inventory Control Records: Property is maintained and disposed of, and property management procedures are in place.

Furniture & Equipment Assets (a.k.a. Fixed Assets)

Most of the furniture and equipment purchased are considered assets and not expenses. Once an asset is recorded, its useful life is determined. A portion of the asset's cost is then expensed each year over the predetermined useful life using what is called a "contra" account. In the case of furniture and equipment, the contra account is called "accumulated depreciation."

Over time, the asset account and the corresponding accumulated depreciation account are netted together to determine the "book value" of the assets. The book value is used to determine the gain or loss when the asset is sold or abandoned.

The organization should establish a "capitalization policy." All items above an amount set by the organization are treated as assets, while items with a cost below the threshold are expensed when purchased. The threshold is not the same for every organization, and it should be based upon the size of the organization. For small organizations, a limit of \$300 to \$500 might be appropriate.

Periodic reviews of the fixed assets should be made to verify the list matches the actual items owned and used.

Computer a HP Envy laptop purchased in 2013 with CSBG funds the serial number is 5cg33656xk.

The CSBG grant application requires that all equipment purchased with CSBG funds in the last 5 year be listed on the grant application. For the CSBG FFY 2018 application the following will be required.

COMMUNITY SERVICES BLOCK GRANT SERVICE PROVIDER/PROJECT INVENTORY FORM

Please list all equipment purchased with CSBG funding during the last 5 years.

Name of Equipment	Type of Equipment	Program Year Purchased	Serial Number	Is item still utilized in program?		If no, explain what happened to equipment
				Yes	No	
HP	Laptop Computer	2013	5cg33656xk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	