

INTERSTATE COMMISSION FOR
ADULT OFFENDER SUPERVISION

02-2009 - RECORD RETENTION AND DESTRUCTION

POLICY NUMBER	ISSUED	REVISED
02-2009	August 11, 2009	June 24, 2026

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I. Authority

The Executive Committee is vested with the power to adopt a policy on behalf of the Interstate Commission during periods when the Interstate Commission is not in session. The Executive Committee oversees the day-to-day activities managed by the Executive Director.

II. Applicability

This Policy applies to all physical and electronic records produced by ICAOS. This policy is not applicable to records or documents produced by member states that are maintained in accordance with policies and procedures established by their respective states.

III. Policy

The policy is to ensure that records and documents produced by the Commission are adequately protected.

IV. Administration

A. The Executive Director's designee is responsible for the implementation and administration of the record retention schedule shown in Schedule A.

B. Distribution of Open and Closed Session Records

   1. Open Session Records

      Approved open session minutes of the Commission and its committees shall be made publicly available, including posting on the Commission's website, in accordance with Commission practice. Such records shall be retained permanently in accordance with Schedule A.

   2. Closed session minutes shall be maintained as confidential records and distributed only to authorized members and staff. These records shall be retained permanently and maintained separately in accordance with approved records management practices. Closed session materials shall remain confidential unless the Commission, in consultation with legal counsel, determines that confidentiality is no longer required.

C. Suspension of Record Disposal In the Event of Litigation or Claims

In the event ICAOS becomes party to a court action, a government investigation, or audit the disposal of any and all records and documents shall be suspended until such time as the Executive Director, with the advice of counsel, determines otherwise.

D. Record Keeping

Except in the case of electronic email records noted in Schedule A, whenever an employee disposes of records in accordance with the schedule outlined in Schedule A, the employee shall prepare a written log identifying the records and documents destroyed, the date destroyed and by whom.

SCHEDULE A RECORD RETENTION SCHEDULE (ICAOS)

A. GRANTS

Record Type	Retention Period
Original grant proposal	5 years after completion of grant period
Grant agreement and subsequent modifications	5 years after completion of grant period
All requested IRS/grantee correspondence	5 years after completion of grant period
Final grantee reports, both financial and narrative	5 years after completion of grant period
All evidence of returned grant funds	5 years after completion of grant period
All pertinent formal correspondence	5 years after completion of grant period
Report assessment forms	5 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	5 years after completion of grant period
Grantee work product produced with the grant funds	5 years after completion of grant period

B. CONTRACTS

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	36 months after expiration or termination
Memorandum of Understanding	36 months after expiration or termination
Statements of work for national data system	36 months after completion
Hotel vendor contracts	36 months after contracted dates

C. Commission RECORDS

Record Type	Retention Period
Minutes of all Commission Meetings	Permanent
Corporate Seals	Permanent
Articles of Incorporation	Permanent
Commission Rules and Bylaws	Permanent
Annual Corporate Reports	Permanent

D. CORRESPONDENCE AND INTERNAL MEMORANDA

1. Correspondence and internal memoranda pertaining to routine matters and having no significant, lasting consequences should be discarded within two years. Some examples include:
    - Routine letters and notes that require no acknowledgment or followup, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
    - Form letters that require no followup.

- Letters of general inquiry and replies that complete a cycle of correspondence.
- Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
- Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
- Chronological correspondence files.

2. Correspondence and memoranda pertaining to nonroutine matters or having significant lasting consequences should generally be retained permanently in the file management system of the national office. Email records meeting the need for permanent retention should be transferred out of email servers for retention in the standard file management system. Some examples include sensitive or confidential correspondence affecting business processes, responsibilities, or standards.

E. ELECTRONIC DOCUMENTS

1. Electronic Mail: shall, unless noted otherwise below, be retained for six months, after which time it can be deleted. Email attachments are to be handled according to topic as set forth in this policy.
    - Fiscal Correspondence: Includes all information related to revenue and expenses. Fiscal correspondence is retained according to the accounting guidelines set forth in this policy.
    - General Correspondence: Includes information as it relates to customer/member interaction and operational decisions. General correspondence resulting in a policy decision is retained according to the guidelines set forth in this policy.
    - Momentary Correspondence: Includes personal email, requests for recommendations and review, carbon copy emails, project development, and status updates. Momentary correspondence can be deleted at will.

2. PDF documents, Spreadsheet, and Word Processing Documents, Spreadsheet, and Word Processing Documents –PDF files are retained based upon the content of the file and the category under the various sections of this policy.
3. Faxed Documents – Fax documents are retained based upon the content of the file and the category under the various sections of this policy.
4. In the event a document is maintained in both paper and electronic form, the official document will be the electronic document.

F. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Advisory Opinions	Permanent
Dispute Resolutions	Permanent
Mediations	Permanent
Bench Book for Judges	Permanent: Current version/revision history
Rules	Permanent
Litigation Files	Permanent
Court Orders	Permanent

G. MISCELLANEOUS

Record Type	Retention Period
Commission Policies and Procedures	Permanent
Annual Reports	Permanent
Inventory Records	5 Years
Training Curriculum and Presentations	5 Years
Training Bulletins	5 Years
Newsletters	5 Years
Audit Information and Responses	5 Years
Supervised Individual Data Collection	5 Years
Best Practices Documents	5 Years
Self Assessment Audits	5 Years
Surveys	5 Years

H. NATIONAL DATA SYSTEM

All records and case information entered in the national data system authorized by the commission is the property of the member states and is maintained according to the laws and policies of the member states.

No records or attachments will be permanently disposed of without the express written permission of the member state that provided the information. Requests for record disposal will be maintained permanently. The Commission's record retention and archiving practices include the following:

- Compact data entries and case activities will remain within the system database as part of the permanent record.
- Uploaded attachments associated with compact cases will be retained in active storage for 10 years after a case is made historical.
- After the 10-year retention period, attachments will be archived to long-term cloud storage.
- Cases closed due to death will be archived in accordance with records management practices.
- Archived records and attachments will remain accessible upon request.

Record Type	Retention Period
Data Audits	Permanent

SCHEDULE B - RECORD RETENTION SCHEDULE

B. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Claims Files (including correspondence, medical records, injury documentation, etc.)	10 years
Insurance Policies	10 years

C. PAYROLL DOCUMENTS

Record Type	Retention Period
Employee Deduction Authorizations	Permanent
Payroll Deductions	Permanent
W-2 and W-4 Forms	Permanent
Garnishments, Assignments, Attachments	Permanent
Labor Distribution Cost Records	8 years
Payroll Registers (gross and net)	8 years

C. PERSONNEL DOCUMENTS

Record Type	Retention Period
Job Advertisements	3 years
Background Checks, Credit Reports, & Financial Records	1 year
I-9 & Identification	3 years after hire or 1 year after separation
Employment Offers, Contracts, Handbooks	1 year
Medical Records, Health Insurance Enrollment Accommodation Request, Disability Records	2 years
Payroll Records	5 years
Personnel Annual Reviews	2 years
Personnel Contact Information	1 year after separation
Disciplinary Documents	2 years and 1 year after separation
Personnel Training Plans	3 years or upon separation
Separation Records	2 years
Non-medical Benefit Records	2 years
FMLA Documentation	3 years
Complaint Investigations	Until resolved or otherwise indicated

D. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable ledgers and schedules	5 years
Accounts Receivable ledgers and schedules	5 years
Audit Reports and Financial Statements	5 years
Audit Records (Including work papers and other documents that relate to the audit)	5 years
Bank Statements and Canceled Checks	5 years
Budget Worksheets, Plans, & Projections	5 years
Invoices	5 years
Expense Reports	7 years
General Ledgers	5 years
Investment Records	5 years
Credit card records	5 years
Depreciation records	5 years

E. PROPERTY RECORDS

Record Type	Retention Period
Lease Agreement/Property Deed	5 years
Property Insurance	10 years

F. TAX RECORDS

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
IRS Correspondence	5 years
Excise Tax Records	5 years
Tax Bills, Receipts, and Statements	5 years
Tax Returns - Income, Franchise, Property	5 years
Tax Workpaper Packages – Originals	5 years
Sales/Use Tax Records	5 years
Annual Information Returns - Federal and State	5 years
IRS or other Government Audit Records	5 years