



## Records Retention and Destruction Policy

**Purpose:** The purpose of this policy is to ensure that Harbor Regional Center (Harbor) maintains, protects, and appropriately disposes of its records in accordance with legal, contractual, and regulatory requirements. Proper retention of corporate records supports transparency, organizational accountability, cost-effective storage practices, and the preservation of information necessary for operations, audits, and compliance with the Department of Developmental Services (DDS).

**Scope:** This policy applies to all members of the Board of Trustees, all employees, contractors and any individual acting on behalf of Harbor who creates, receives, maintains or stores corporate records in any format, including paper and electronic media.

**Definition of Corporate Records:** Corporate records include all documents created or received in the course of Harbor business. Records may exist in electronic, digital, or paper form and include, but are not limited to, correspondence, emails, contracts, payroll information, financial data, legal documents, individuals served and provider records, calendars, reports, handwritten notes and other documentation identified in HRC's administrative procedures.

### Records Retention Requirements

Harbor shall retain corporate records in compliance with:

- Applicable federal and state law;
- Harbor's contract with the Department of Developmental Services (DDS);
- Generally accepted accounting principles; and
- The retention standards and schedules adopted by the organization

Certain categories of records have unique minimum retention requirements due to legal, operational, contractual or audit needs. Departmental responsibilities for specific records are defined in Harbor's internal Record Retention & Destruction Procedure.

**Electronic Communications:** Electronic communications, including email, voicemail, text messages and communication transmitted through Harbor electronic systems—are considered corporate records when they document business decisions, transactions, obligations or information related to categories identified in the retention schedule.

Harbor's systems may employ automated deletion features to comply with retention schedules. Employees and board members must ensure that any electronic communication that constitutes an official record is preserved in accordance with the administrative procedure, regardless of the system's automated settings.

**Storage of Records:** Harbor maintains records in a combination of secure onsite and offsite storage locations and within approved digital systems. Electronic storage shall comply with DDS' "Requirements for Electronic Storage of Records" and any subsequent directives issued by DDS. Department leadership is responsible for ensuring that records are stored safely, securely and in accordance with approved procedures.

**Destruction of Records:** Records shall be destroyed only in accordance with Harbor's document retention and destruction procedures. Records approved for destruction must be shredded or otherwise permanently rendered unreadable.

Authority to approve destruction of records lies with the designated department leaders identified in the administrative procedure. No record may be destroyed if it is relevant to current or reasonably foreseeable litigation, audit, investigation or public records request. A litigation hold issued by the Executive Director supersedes all scheduled destruction timelines.

**Compliance:** All board members and employees are responsible for understanding and complying with this policy and the administrative procedures that support it. Failure to adhere to retention requirements may expose Harbor to legal risk or financial penalties.

Any questions regarding record retention, destruction or potential litigation holds should be directed to the Chief Financial Officer or the Executive Director.

### **Delegation to the Executive Director**

The Board delegates to the Executive Director the authority to:

- Establish and update procedural guidelines;
- Maintain retention schedules consistent with law and DDS requirements;
- Implement electronic systems that support secure storage and lawful destruction; and
- Issue litigation holds when necessary

*Approved by the Harbor Developmental Disabilities Foundation Board of Trustees on  
January 20, 2026*