CITY OF CHIPLEY
GRANT RECORDS RETENTION, STORAGE, AND DESTRUCTION POLICY

1. Purpose

The purpose of this policy is to establish requirements for the retention, storage, protection, accessibility, and authorized destruction of records associated with federal and state awards. This policy is intended to ensure compliance with applicable federal and state laws, regulations, grant agreements, and the City's records management requirements, including 2 CFR § 200.334.

2. Scope

This policy applies to all City departments, employees, grant administrators, finance personnel, contractors, and other authorized individuals who create, receive, maintain, store, or dispose of records associated with federal awards.

Records covered by this policy include, but are not limited to:

- Grant applications, award agreements, amendments, and correspondence.
- Financial records, invoices, receipts, payroll records, and payment documentation.
- Procurement records, contracts, purchase orders, and supporting documentation.
- Project reports, performance reports, reimbursement requests, and supporting records.
- Monitoring reports, audit documentation, corrective action plans, and closeout records.
- Electronic communications and other records necessary to document grant activities and expenditures.

3. Record Retention Requirements

The City shall retain federal award records in accordance with 2 CFR § 200.334, applicable state and local records retention requirements, grant award terms, and other applicable legal requirements. Unless a different period applies under an authorized regulatory exception, federal award financial records, supporting documents, statistical records, and other pertinent records shall be retained for three years from the date of submission of the final financial report. For awards renewed quarterly or annually, the applicable retention period shall be calculated from the date of submission of the quarterly or annual financial report, as applicable. Records subject to special retention requirements, including records associated with litigation, claims, audits, monitoring findings, investigations, or unresolved compliance matters, shall be retained until all applicable requirements have been satisfied.

When multiple retention requirements apply, the City shall follow the requirement that necessitates the longest retention period.

4. Records Storage and Security

The City shall maintain grant records in a practical, organized, secure, and accessible filing system.

A. Electronic Records

Grant-related electronic records shall be stored on the City's designated Share Drive or another approved electronic records management system. Electronic records shall be organized by grant program, award number, project, fiscal year, or other consistent identifiers. The City's designated information technology (IT) contractor shall maintain offsite backups of electronic records in accordance with the City's established backup and disaster recovery procedures. Access to electronic grant records shall be limited to authorized personnel. The City shall implement appropriate safeguards to protect records against unauthorized access, alteration, loss, or destruction.

B. Physical Records

Physical grant records shall be maintained in designated filing areas, cabinets, or secure storage locations. Records shall be organized by grant program and award to facilitate retrieval during audits, monitoring reviews, and other authorized requests. Physical records shall be protected against unauthorized access, damage, loss, and premature destruction.

C. Accessibility and Retrieval

The Grant Administrator shall ensure that grant records can be located and provided to authorized federal, state, and local officials upon request, subject to applicable confidentiality and disclosure requirements.

5. Responsibilities

A. Grant Administrator

The Grant Administrator shall:

1. Maintain or coordinate the maintenance of grant records.
2. Ensure grant records are organized and retained according to applicable requirements.
3. Identify records approaching the end of their required retention periods.
4. Verify whether audits, monitoring activities, claims, litigation, investigations, or other restrictions prevent destruction.
5. Prepare a request when records become eligible for destruction.
6. Maintain or coordinate the maintenance of records retention and destruction documentation.

B. Designated Records Custodian

The Records Custodian shall:

1. Review proposed records destruction requests for compliance with applicable grant, financial, and records retention requirements.
2. Verify that the applicable retention period has expired.
3. Confirm that no outstanding audit, monitoring finding, claim, litigation, investigation, or other legal or administrative requirement prohibits destruction.
4. Recommend approval or denial of the destruction request.
5. Ensure that relevant personnel are notified of any hold on records destruction.

C. Designated Records Custodian

The designated records custodian shall:

1. Ensure that applicable state and local records management requirements are considered before destruction.
2. Review proposed destruction requests when required by applicable records retention laws or City procedures.
3. Maintain destruction documentation when assigned responsibility for the official records management file.

D. City Administrator

The City Administrator, or another official formally designated in writing by the City, shall serve as the authorized approving authority for the destruction of grant-related records, subject to any additional approval required by law or City policy. The authorized approving authority shall review the destruction request and provide written approval before any grant-related records are destroyed.

E. Information Technology Contractor

The City's IT contractor shall maintain electronic backup procedures and, upon receipt of documented authorization from the City, assist with the secure deletion of eligible electronic records. The IT contractor shall not independently authorize the destruction of grant records. Destruction shall occur only after the required City approval has been obtained and documented.

6. Authorized Records Destruction Procedures

Grant-related records shall not be destroyed solely because they have reached a specified age. Destruction must follow the review and approval procedures below.

Step 1: Identify Records Eligible for Destruction

The Grant Administrator shall identify records whose applicable retention periods have expired.

Step 2: Verify Retention Requirements and Holds

Before submitting a destruction request, the responsible personnel shall verify that:

- The applicable federal award retention period has expired.
- All required grant closeout and financial reporting obligations have been addressed.
- No outstanding audit, monitoring review, unresolved finding, claim, litigation, investigation, or other legal or administrative hold requires continued retention.
- Applicable state and local records retention and disposition requirements have been satisfied.
- No grant agreement or other applicable requirement mandates a longer retention period.

If any requirement remains unresolved, the records shall not be destroyed until the hold or restriction has been formally cleared.

Step 3: Prepare a Records Destruction Request

The Grant Administrator shall prepare a written request identifying:

- Grant program and award number.
- Description of the records proposed for destruction.
- Date range of the records.
- Applicable retention requirement and calculation of the retention expiration date.
- Confirmation that required reviews and hold checks have been completed.
- Proposed destruction method.
- Name and title of the person preparing the request.

Step 4: Review and Approve

The Records Custodian shall review the request for compliance with grant and financial record requirements. The designated records custodian shall review the request when necessary to ensure compliance with applicable public records and records disposition requirements. The City Administrator or formally designated authorized approving authority shall provide written approval or denial before destruction occurs. No employee, department, or contractor may independently authorize the destruction of grant-related records.

Step 5: Destroy Approved Records

Following written approval, records shall be destroyed using a method appropriate to their format and sensitivity.

- Paper records shall be shredded or disposed of through another secure method that prevents unauthorized disclosure.

- Electronic records shall be securely deleted by authorized City personnel or the City's IT contractor.
- Backup copies and other retained versions shall be addressed under the City's approved backup and records disposition procedures, subject to applicable retention, recovery, and legal hold requirements.

Step 6: Document Completed Destruction

After destruction is completed, the responsible personnel shall document the date of destruction, the method used, the records destroyed, the approving official, and the individual or contractor who performed or verified the destruction. The documentation shall be maintained in the City's designated records management location in accordance with applicable retention requirements.

7. Prohibition on Unauthorized Destruction

No City employee, department, contractor, or other authorized user may destroy, delete, alter, conceal, or dispose of grant-related records without following this policy and obtaining the required written approval. When an audit, monitoring review, investigation, claim, litigation, public records obligation, or other applicable requirement may affect records disposition, destruction shall be suspended until the responsible City official confirms in writing that the records are eligible for destruction. Violations of this policy may result in appropriate administrative or disciplinary action, consistent with applicable law and City policy.

8. Monitoring and Compliance

The City Administrator or designated official shall periodically review the City's grant records retention and destruction practices to verify compliance with this policy. The City shall make applicable records available to authorized federal and state officials in accordance with applicable requirements. This policy shall be reviewed periodically and updated as necessary to reflect changes in federal regulations, state law, grant requirements, or City procedures.

9. Effective Date and Adoption

This policy shall become effective upon formal approval by the City's authorized governing or approving authority.

All departments and personnel responsible for grant administration and records management shall comply with this policy.