

SAN FRANCISCO JUVENILE PROBATION DEPARTMENT POLICY AND PROCEDURE MANUAL

ADMINISTRATION AND FINANCE

CHAPTER: ADMINISTRATION, ORGANIZATION AND MANAGEMENT, JUVENILE RECORDS

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RECORDS RETENTION AND DESTRUCTION POLICY, PROCEDURE, AND DESTRUCTION SCHEDULE

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I. POLICY AND PROCEDURE INTRODUCTION

The Juvenile Probation Department's Record Retention and Destruction Policy is adopted pursuant to Chapter 8 of the San Francisco Administrative Code, which requires each department head to maintain records and create a records retention and destruction schedule.

This policy covers all records and documents, regardless of physical form or characteristics, which have been made or received by the Juvenile Probation Department in connection with the transaction of public business.

This policy recognizes the distinction between the broad definition of a public record for the purposes of the Public Records Act and the Sunshine Ordinance and a narrower category of records the department must retain for certain periods of time. Record retention addresses the life cycle of documents. Every single document the City and County of San Francisco ("City") prepares or receives does not warrant indefinite preservation.

The Sunshine Ordinance requires the City Administrator to compile an index of records ("index") that identifies the types of information and documents the City's departments, agencies, boards, commissions, and elected officials are required to maintain.

II. RETENTION POLICY

The Juvenile Probation Department shall retain any record for the period of its immediate or current utility and thereafter may destroy the record unless City or state law or contractual obligations require the City to retain the record for a specific period. For record retention and destruction purposes. Section 8.1 of the San Francisco Administrative Code defines the term "record" to include any paper, book, photograph, film, sound recording, map, drawing, or other document, or any copy thereof, that has been made or received by the department in connection with the transaction of public business and that the department may have retained: 1) as evidence of the department's activities; 2) for the information contained in it; or 3) to protect the legal or financial rights of the City or of persons directly affected by the activities of the City. The department may destroy documents and other materials that do not qualify as "records" under Section 8.1, including those described below in Category 4, when no longer needed, unless otherwise specified in Part II. Documents in the attached destruction schedule (XIV) will be destroyed through shredding internally or through use of an outside vendor. The department may classify all records as follows:

<u>Category 1: Permanent Retention.</u> The department may retain records that the law classifies as permanent or essential and preserve them indefinitely.

- <u>Permanent records</u>. The law requires an indefinite retention period for permanent records. The department may not destroy records unless it takes special measures,
- including, but not limited to, microfilming the records, or placing them on an optical imaging system and storing the original film or tape in accordance with Administrative

Code Section 8.4. Once the department takes these measures, it may destroy the original paper records. The department may destroy duplicate copies of permanent records whenever the duplicate copies are no longer necessary for the efficient operation of the department. Examples of permanent records include official records of a department or commission action.

 <u>Essential records</u>. Essential records are records necessary for the continuity of government and the protection of the rights and interests of individual (Admin. Code Section 8.9). Examples of essential records include advice letters and opinions, policy memoranda, building permits, business licenses, and interpretive materials such as manuals.

<u>Category 2: Current Records.</u> The department may classify records it retains in the office or facility for employee convenience, ready reference, or other reasons, as current records. The department shall retain current records as follows:

- Where law specifies retention period. The department shall retain current records in accordance with time periods specified in federal, state, or local law. Examples of records that the law specifies particular retention periods for include Statement of Economic Interest Form 700 (required by California Government Code Section 81009(e)) and Accident Injury reports.
- Where law does not specify retention period. If the law does not specify a particular time for retention, the department must comply with the time periods specified in the Schedule. The department must retain current records for a minimum of two years, although such records may be treated as "storage records" and stored off-site during the applicable retention period. Examples of current records include invoices for purchases of supplies, department memoranda, and budget documents.

<u>Category 3: Storage Records</u>. The department may classify records as storage records and retain them off-site. These records are subject to the same retention requirements as current records.

Category 4: No retention Required. The department may classify documents and other materials that do not meet the definition of a "record" pursuant to Administrative Code Section 8.1 as Category 4 documents. Unless applicable law or the Schedule states otherwise, the department may destroy such documents and materials (including originals and duplicates) that it no longer needs to function or continue operating. These documents may not have legal needs to function or continue operating. These documents may not have legal significance. Examples include materials and documents generated for the convenience of the person generating them, draft documents (other than certain contracts) that are superseded by subsequent versions or rendered moot by departmental action, and duplicate copies that are no longer needed. Specific examples include telephone message slips, miscellaneous correspondence that do not require follow-up or departmental action, notepads, emails that do not contain information that the department is not required to retain under this policy, and chronological files.

III. RECORDS NOT ADDRESSED IN THE RECORDS RETENTION SCHEDULE

The department may destroy records and other documents or materials that are not expressly addressed in the attached Schedule provided that the department has retained the documents for the periods prescribed for substantially similar documents.

IV. STORAGE OF RECORDS

The department may store records on-site if the department actively uses or maintains the records in the office for convenience or quick reference. Examples of active files the department may appropriately maintain on-site include active chronological files, research and reference files, legislative drafting files, pending complaint files, administrative files, and personnel files.

The department may send to the City's off-site storage facility or the department's storage facility inactive records, the department's use of or reference to has diminished sufficiently to permit removal. Departments may not send boxes to the off-site storage facility without a destruction date. Records sent to storage within the same box must all have the same destructive date. The setting of destruction date should be keyed to the end of the fiscal year in which the document was created unless otherwise specified. We urge all departments to periodically review their documents stored off-site for compliance with their Schedule.

V. HISTORICAL RECORDS

Historical records are records that the department no longer uses but may be of historical interest or significance because of their age or research value. A department may not destroy historical records except in accordance with the procedures set forth in Administrative Code Section 8.7.

VI. PENDING CLAIMS AND LITIGATION

The retention periods set forth in the attached Schedule do not apply to materials that are relevant to a pending claim or litigation against the City, even if the records are otherwise eligible for destruction.

Once the department becomes aware of the existence of a claim or litigation against the City, it must notify the City Attorney's Office, who must then notify all affected City departments. Notwithstanding the Schedule, the respective departments must retain all documents and other materials related to the claim or litigation until the City Attorney's office reports that the claim or litigation has been finally resolved.

VII. BACKUP TAPES OR SIMILAR ARCHIVAL SYSTEMS

The department may use backup tapes or similar archival systems that serve the limited purpose of providing a means of recovery in cases of disaster, departmental system failure, or unauthorized deletion. The department may not access the backup tapes or similar archival systems except in these limited situations. Electronic records such as emails that an

employee has properly deleted under the department's Schedule but that remain on backup tapes, or a similar archival system are analogous to paper records that the department has lawfully discarded but may be found in a City-owned dumpster. Neither the Public Records Act nor the Sunshine Ordinance requires the City to search the trash for such records, whether paper or electronic.

VIII. EMAIL SYSTEM

The email system does not fulfill the department's record retention obligations. The department provides an email system to its employees as a convenient and efficient medium of communication. However, the email system is not a medium for storage of information or any of the department's records.

If the department's Schedule requires the retention of an email itself, an attachment to the email, or a link in the email, the department may not rely on the email system to satisfy the retention requirement. Departmental staff must determine with regard to each email or attachment whether the department's Schedule requires retention of a particular record. If the Schedule requires retention of the email, staff must retain it in accordance with the Schedule and delete if from the email system. If the Schedule does not require retention of the email the staff may either delete it as soon as it is no longer necessary for the immediate discharge of official duties or store it elsewhere for as long as the staff deems appropriate. In any case, whether to satisfy records retention obligations or merely to serve administrative needs, the staff must not store the email communication on the email system.

IX. RECORDS RELATING TO FEDERAL AWARDS: EMERGENCY/DISASTER AND COST RECOVERY

Records relating to federal awards, including public assistance following an emergency or disaster, are governed by 2 C.F.R. § 200.333. This regulation requires retention of any and all records relating to a federal award for three (3) years after the State has closed the claim by the City. The City shall retain all records relating to the federal award for three (3) years from the date the State has closed the claim by the City (i.e., the date of the final Financial Status Report (FSR) (FEMA Form 112-0-1), unless certain exceptions apply (see 2 C.F.R. § 200.333). California law also requires the City retain all financial and program records related to cost or expenditures eligible for state financial assistance for three (3) years. 19 CCR § 2980(e).

The records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later. Final closeout (receipt of FSR) is when <u>all</u> Project Worksheets associated with a disaster/emergency are closed. All records related to any and all Project Worksheets associated with an event must be retained for 3 years after the close of the final associated Project Worksheet. Note: state and federal regulations change from time to time; the Controller's Office will issue specific rules for file retention on any given disaster, should there be a change.

X. RECORDS RELATING TO FINANCIAL MATTERS

The Controller's Office must approve all records pertaining to financial matters proposed for destruction before the department destroys them. (Admin. Code Section 8.3). The Controller's Office reviews and approves each department's Schedule. Departments may destroy documents consistent with the Schedule. The department must obtain approval from the Controller's Office to destroy documents pertaining to financial matters that do not fall within the Schedule.

XI. RECORDS RELATING TO PAYROLL RECORDS

The Retirement Board must approve all records pertaining to payroll checks, timecards, and related documents proposed for destruction before the department destroys them. (Admin. Code Section 8.3). The Retirement Board reviews and approves each department's Schedule. Department's may destroy documents consistent with the Schedule unless the Retirement Board requests the documentation be sent to them. The department must obtain approval from the Retirement Board to destroy documents pertaining to payroll checks, timecards, and related documents that do not fall within the Schedule.

XII. RECORDS THAT CONTAIN LEGAL SIGNIFICANCE

The City Attorney's Office must approve all records containing legal significance proposed for destruction before the department destroys them. (Admin. Code Section 8.3). The City Attorney's Office reviews and approves each department's Schedule. Departments may destroy documents consistent with the Schedule. The department must obtain approval from the City Attorney's Office to destroy documents that contain legal significance that do not fall within the Schedule.

XIII. JUVENILE RECORDS RETENTION

"Juvenile Records" include all records regarding the arrest, custody, and/or detention of a minor; and for filed petitions, all juvenile court proceedings, and all associated documents/ reports retained by probation. Juvenile Records include both **Juvenile Hall** and **Probation Services** records. Juvenile Records do not include AB 12 Unit records (see Section I).

Sustained 707(b) and/or PC 290.008 petitions, for offenses committed when the individual was 14 or older, <u>are not eligible for record destruction</u> under any circumstances.

A. JPD Juvenile Case File Retention/Destruction

Case Type	Paper File	Digital File
Arrest w/o Petition ¹	Misdemeanors: Destroy 2 years from the date of arrest or citation. Felonies: Destroy 7 years from the date of arrest or citation.	Misdemeanors: Destroy 2 years from the date of arrest or citation. Felonies: Destroy 7 years from the date of arrest or citation.
WIC 300	Destroy 5 years from the date on which the jurisdiction of the juvenile court over a minor is terminated.	Destroy upon reaching 28 years of age
WIC 601	Destroy 5 years from the date on which the jurisdiction of the juvenile court over a minor is terminated.	Destroy upon reaching 21 years of age
WIC 602	Destroy 5 years from the date on which the jurisdiction of the juvenile court over a minor is terminated.	Destroy upon reaching 38 years of age
Marijuana misdemeanor HSC 11357	Destroy upon reaching 18 years of age or five years from the date on which the jurisdiction of the juvenile court over a minor is terminated, whichever comes first.	Destroy upon reaching 18 years of age
WIC 389 Seal	Destroy 5 years after the record was ordered sealed.	Destroy 5 years after the record was ordered sealed.
WIC 781 Seal	Destroy 5 years after the record was ordered sealed. ²	Destroy upon date specified by Court Order. If no date specified, destroy upon reaching 38 years of age.
WIC 781.5 Seal	Destroy 3 years from the date of arrest or citation.	Destroy 3 years from the date of arrest or citation.

¹ SFDA Discharge Retention Policy: Misdemeanors: Retain for 2 Years; Felonies: Retain for 7 Years.

² Destroy after five years even if there is no digital record.

Case Type	Paper File	Digital File
WIC 786 Seal	Destroy upon date specified by Court Order. If no date ordered, destroy upon reaching 38 years of age.	Destroy upon date specified by Court Order. If no date ordered, destroy upon reaching 38 years of age.
Sealed pursuant to WIC 793	Destroy as indicated above (WIC 300, 601, or 602, as applicable)	Destroy as indicated above (WIC 300, 601, or 602, as applicable)
Sealed pursuant to WIC 786.5	Destroy as indicated for Arrest w/o Petition	Destroy as indicated for Arrest w/o Petition
Sealed	Destroy within one year from the date of arrest,	Destroy within one year from date of
pursuant to	or withing 90 days after the court order is	arrest, or within 90 days after the court
PC 236.14	granted, whichever occurs later.	order is granted, whichever occurs first.

Per the City Attorney's interpretation of WIC 10851, JPD should retain electronic AB12 files indefinitely, and keep the physical files for three years and then destroy them.

B. References

Unsealed Records – Judicial Council of California Minimum Retention Period³

Case Type	Minimum Retention Period	Additional Consideration
WIC 300	Upon reaching 28 years of age	Or upon written request, after 5 years
WIC 601	Upon reaching 21 years of age	Or upon written request, after 5 years
WIC 602	Upon reaching 38 years of age	Except sustained 707(b) petitions, for offenses committed when the individual was 14 or older
HSC 11357	Upon reaching 18 years of age	Shall be destroyed, pursuant to HSC 11361.5

Sealing Statutes and Destruction Dates - California Department of Justice⁴

Seaming Statestics and Destruction Dates Camorina Department of Sastice				
Statute	DOJ Destruction Date			
WIC 389	Shall destroy 5 years after the record was ordered sealed.			
WIC 781	May be destroyed 5 years after the record was ordered sealed.			

³ Trial Court Records Manual, Revised January 1, 2020, Judicial Council of California: https://www.courts.ca.gov/documents/trial-court-records-manual.pdf

⁴ Department of Justice Sealing Statutes and Destruction Dates (3/11/2020)

Statute	DOJ Destruction Date
WIC 781.5	Shall destroy 3 years from the date of arrest or citation.
<u>WIC 786</u>	Court order must specify destroy date (effective 01/01/16).
WIC <u>793</u>	Destroy date not stated.

^{*}DOJ did not include WIC 786.5 on their list

PART XIV
RECORD RETENTION AND DESTRUCTION SCHEDULE

Record	Tuno of Decord	Retention	Retention Period			
Category	Type of Record	Category	Off-Site	On-Site*	Total	Remarks
Administration and Finance	Administrative files	2	2 years	2 years	4 Years	
	Correspondence	2	4 Years	4 Years	8 Years	
Emergency Management (Citywide)	City Disaster/cost recovery documentation – Citywide	2	N/A	3 Years from date of final Financial Status Report (FEMA Form 112-0-1)	3 Years from final closeout	Covers all documents relating to Federal Emergency Management Agency (FEMA) and California Governor's Office of Emergency Services (CAL OES)
	Grand Jury Reports	2	12 Years	12 Years	12 Years	
Administrative	Audio/Video recordings not otherwise specified	2	0	2 years	2 years	
Administrative	Calendar (department head)	4	0	2 years	2 years (min.)	Required by Admin. Code §67.29-5
Administrative	Correspondence not requiring follow-up	4	0	NA	None	
Administrative	Correspondence, miscellaneous	2	Main Library	2 years	2 years	
Administrative	Executive Officer Reports	2	0	5 years	5 years	
Administrative	Interdepartmental Correspondence	2	0	2 years	2 years after FY	
Administrative	Memoranda, miscellaneous	4	0	NA	None	

Record	Tuno of Decord	Retention	Re	D		
Category	Type of Record	Category	Off-Site	On-Site*	Total	Remarks
Administrative	Memoranda, policy/decisional	2	0	Permanent	5 years until Superseded	
Administrative	Publications, reports created by department	2	0	2 years	2 years	
Administrative	Reports/Official Publications/Annual reports	1	Main Library	Permanent	Permanent	Department Policy
Administrative	Records relevant to Rule revisions (bargaining history, proposals, etc.)	1	0	Permanent	Permanent	
Budget	Budget Files	2	0	2 years	2 years	
Chronological Files	Chronological Files (i.e., documents maintained in the "Chron Files" which are not otherwise specifically identified in this chart)	4	0	3 years	3 years	Department Policy
Commission	Agendas, Notices and Minutes of Commission and Committee Meetings	1	Main Library	5 years	Permanent	Department Policy
Commission	Audio Recordings of Commission Meetings	1	0	Permanent	Permanent	Required by Adm. Code §67.14
Commission	Commission Correspondence	2	0	2 Years	2 Years	Department Policy
Commission	Commission Files	1	Main Library	5 Years	Permanent	Department Policy
Commission	Commission Packets	1	0	2 Years	2 Years	Department Policy
Commission	Motions and Resolutions	1	Main Library	5 Years	Permanent	Department Policy

Record	Type of Record	Retention	Ro	Domonlo		
Category	Type of Record	Category	Off-Site	On-Site*	Total	Remarks
Financial	Audit Reports	1	0	Permanent	Permanent	Department Policy
Financial	Audit Work Papers	2	0	1 Years	2 Years	
Financial	Contract Correspondence	2	0	2 Years	2 Years or life of Agreement	
Financial	Contracts/Agreements/MOU's	2	0	2 Years	2 Years or life of Agreement	
Financial	Exchanged Drafts of Agreements	2	0	2 Years	2 Years	Admin Code §67.24(a)
Financial	Financial Records, Misc	2	0	2 Years	2 Years after FY	
Financial	Invoices	2	0	2 Years	2 Years after FY	
Financial	Payables (Invoices)	2	0	2 Years	2 Years	
Financial	Purchase Orders	2	0	2 Years	2 Years	
Financial	Travel and Reimbursement Records	2	0	2 Years	2 Years	
Financial	Work Orders and Payments	2	0	2 Years	2 Years	
Legal	Legal Advice	2	0	Permanent	Until Superseded	
Legal	Settlement Agreements	1	Main Library	5 Years	Permanent	Department Policy
Merit System Reviews	Investigations, Inspection Service Findings, Audits and Appeals	1	0	Permanent	Permanent	
Personnel	ADA Request for Reasonable Accommodation Report	2	0	7 Years	7 Years	

Record	Type of Decord	Retention	R	Da wa da		
Category	Type of Record	Category	Off-Site	On-Site*	Total	Remarks
Personnel	Conflict of Interest Statements/Statements of Incompatible Activities (Form 700)	2	0	7 Years after date of filing	7 years after date of filing	Per State law and the Commission Policy
Personnel	Discrimination Complaints	2	0	7 Years	7 Years	
Personnel	Employment Applications/Resumes/References	2	0	3 Years for individuals who were not appointed; 7 Years following separation of an employee	3 Years for individuals who were not appointed; 7 Years following separation of an employee	
Personnel	Equal Employment Opportunity Plan	2	0	7 Years following separation	7 Years following separation	
Personnel	Ergonomic Records	2	0	7 Years following separation	7 Years following separation	
Personnel	Family Medical Leave Act Records	1	0	3 Years	3 Years	Required by the US Department of Labor
Personnel	INS Form I-9	2	0	3 Years or 1 Year after separation (whichever is longer)	3 Years or 1 Year after separation (whichever is longer)	

Record	Type of Record	Retention Category	Retention Period			
Category			Off-Site	On-Site*	Total	Remarks
Personnel	Payroll Records	2	0	2 Years	2 Years	Secure permission from SFERS prior to destruction
Personnel	Personnel Files	2	0	7 Years following separation	7 Years following separation	
Personnel	Personnel Files – Sealed Documents per MOU	2	0	7 Years following separation	7 Years following separation	
Personnel	Sexual Harassment Complaints	2	0	7 Years	7 Years	
Personnel	Time Rosters	2	0	2 Years	2 Years	Secure permission from SFERS prior to destruction
Personnel	Time Sheets	2	0	2 Years	2 Years	Secure permission from SFERS prior to destruction
Personnel	Workers' Compensation Records	2	0	7 Years following separation	7 Years following separation	Per Commission policy
Personnel	Workers' Compensation Records – Accident and Injury Reports	2	0	5 Years	5 Years	Title 8, Cal Code of Regulations, Section 10102; and Per Commission Policy
Accounting	Milk Fund Documents	2,3	7 Years	7 Years		
	Database/invoice routing slips	2	1 Year	1 Year		

Record	Type of Record	Retention Category	Retention Period			
Category			Off-Site	On-Site*	Total	Remarks
	Vendor Files	2	2 Years	5 Years		
	Automobile Files	2	Indefinitely	Indefinitely		
	Cell Phone/Pager Files	2	Indefinitely	Indefinitely		
	Copy Machine Files	2	Indefinitely	Indefinitely		
Cashier	Juvenile Hall Cash Receipts	2,3	8 Years	8 Years		
	Cash Release Forms	2	5 Years	5 Years		
	Traffic Receipt Payments	2,3	6 Years	6 Years		
	Qtrly Report to Controller	2,3	9 Years	9 Years		
	State Restitution Files	2,3	9 Years	9 Years		
	Restitution to Victims	2,3	12 Years	12 Years		
	Revolving Fund Files	2	2 Years	2 Years		
	Juvenile Hall Valuables Receipt	2	5 Years	5 Years		
	STC Payment Files	2	5 Years	5 Years		
	Budget Variance Analysis Reports	2	3 Years	3 Years		
	Workorder Files	2	1 Year	1 Year		
	Budget Reconciliation Files	2	4 Years	4 Years		
	Forms	2	10 Years	10 Years		
Juvenile Hall Admission Office	Admissions Log	2	9 Years	9 Years		
	Admissions Release	2	21 Years	21 Years		
	Admission Forms	2	3 Years	3 Years		
	Temporary Forms	2	9 Years	9 Years		
	Fingerprinting Log	2	7 Years	7 Years		
	Key Control Log	2	4 Years	4 Years		
	Unit Managers Form	2	6 Years	6 Years		
	Property Slips	2	4 Years	4 Years		
	CTO Records	2	7 Years	7 Years		
	Visitor Logs	2	4 Years	4 Years		

Record Category	Type of Record	Retention Category	Retention Period			Remarks
			Off-Site	On-Site*	Total	Kemarks
	Leave Requests	2	1 Year	1 Year		
	Workers Compensation Form	2	4 Years	4 Years		
	Shift Assignment	2	3 Years	3 Years		
Units	Unit Logs	2	20 Years	20 Years		
	Medical Logs	2	4 Years	4 Years		
	Mental Health Records	2	6 Years	6 Years		
	Discipline Log	2	7 Years	7 Years		
	Room Roster	2	3 Years	3 Years		
	Group Counseling Representative	2	4 Years	4 Years		
	Unit Inspection	2	4 Years	4 Years		
	Fire Inspections/Wkly/Monthly	2	7 Years	7 Years		
	Manager's Report	2	7 Years	7 Years		
	Case Conferences	2	7 Years	7 Years		
	Work Chits	2	3 Years	3 Years		
	Silverware/Meal Count Forms	2	1 Year	1 Year		
	Q5 Suicide Forms	2	6 Years	6 Years		
	Incident Report	2	7 Years	7 Years		
Log Cabin Ranch	General & Administrative Records	2	2 Years	2 Years		
	Health & Sanitation Reports	1	8 Years	8 Years		
	Citizen Complaints	1	7 Years	7 Years		
	Leave Request Forms	2	1 Year	1 Year		
	Logbooks	1	8 Years	8 Years		
	Food Services	2	4 Years	4 Years		
	MOU's	2	6 Years	6 Years		
	Security Check Reports	2	4 Years	4 Years		
	Vehicle Records	2	7 Years	7 Years		
	Annual Inspection Reports	1	8 Years	8 Years		
	Personnel Records	2	8 Years	8 Years		

Record	Type of Record	Retention Category	Retention Period			Remarks
Category			Off-Site	On-Site*	Total	
	Resident Files	2	8 Years	8 Years		
	Facilities Maintenance Reports	2	8 Years	8 Years		
Administrative	Personnel Correspondence	2	7 Years	7 Years		
	Health & Safety Inspection	2	4 Years	4 Years		
	Budget	2	3 Years	3 Years		
Probation Services	Official Probation Case Files	2,3	8 Years or if sustained "strike" case must store permanently	8 Years or if sustained "strike" case must store permanently		Review of file after 5 years
	Unofficial Case Files	2,3	Upon Minor's 18 th birthday	Upon Minor's 18 th birthday		Upon Minor's 18 th birthday
	Correspondence	2	4 Years	4 Years		

^{* &}quot;On-Site" includes the Civil Service Commission's offices and/or its Document Management System(s)

XIV. Revision History:

Revision	Date	Description of changes	Revised By
0	May 2009	Initial Release	Sue Wong
1	August 2023	Revisions, updates	Internal; Deputy City Attorney

RECORD RETENTION_Final_for signatures

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