

CITY OF DETROIT GENERAL
RETIREE HEALTH CARE TRUST

RECORD RETENTION POLICY & DISPOSAL SCHEDULE

Adopted: February 13, 2018

I. PURPOSE

This policy is intended to establish guidelines pertaining to the retention and disposal of the records of the City of Detroit General Retiree Health Care Trust (the “RHC Trust”). As custodian of the records, the Board of Trustees of the RHC Trust has a duty to ensure that records are retained in a secure manner which allows for relative ease of accessibility in addition to protecting the confidentiality of its members and the operations of the RHC Trust.

II. POLICY

The Board intends to have RHC Trust records maintained in an orderly fashion to assure the availability of those records when required and the orderly destruction of records in compliance with a responsible plan. This Policy and the disposal schedule shall be administered in accordance with the Michigan Freedom of Information Act, as amended [MCL § 15.231 *et seq.*], the Records Reproduction Act, as amended [MCL 24.401 *et seq.*], and other applicable laws.

III. RECORDS

For the purpose of this policy “**record**” shall be any document, writing or recording including the original, copies or drafts of whatever kind or nature, however produced or reproduced, including without limitation, handwritten, typewritten, printed, photostatted, photographed, magnetic impulse, electronic recording, electronic mail (email), intranet and electronic billboard posting, databases and documents stored in electronic media. Electronic media includes hard drives (internal and external), computer tapes, computer disks, USB flash drives, compact discs, digitization, digital migration, digital imaging, microfilm, microfiche or any other means of preserving information.

IV. RECORD RETENTION SCHEDULE

Records shall be retained for no less a period of time than provided in the table below. The Board shall determine all questions as to which record series in which a specific record is to be classified.

MINIMUM RETENTION PERIOD	RECORD SERIES
Permanent	RHC Trust documentation (i.e., Trust Agreement, Plan document, etc.); Board meeting minutes; Board meeting agendas; Board Resolutions; Board policies; Annual audits; Annual actuarial valuations; Annual Custodial Bank statements; Legal opinions; Correspondence establishing policy;
Fiscal Year + 7 Years	General Ledger; Payment Records; File established for claims for replacement checks; Invoices; Investment Performance Reports and Analysis prepared by the Board's Investment Consultant and/or Investment Managers; Summary Annual Reports; Trustee Conference/Seminar registration materials; Trustee Expense reports;
Termination/Expiration/Death + 6 Years	Service Provider contracts; Bids, quotes and proposals awarded; Retiree/Beneficiary benefit files; All other Contracts, Leases and Agreements;
3 Years	General correspondence; Bids, quotes and proposals not awarded; trade confirmations otherwise reflected in the annual custodial statement
1 Year + 1 Day	Closed Session Board meeting minutes; Board meeting notices; Freedom of Information Act Requests and Responses;
Upon approval of written minutes	Audio recording(s) of Board meetings;

V. STORAGE OF CERTAIN RECORDS

In administering this policy the Board of Trustees and its Third Party Administrator (“TPA”) recognize that certain records (i.e., closed session minutes, medical records, legal opinions, and retiree/beneficiary personal information) are to be kept in a secure location inaccessible to members of the public.

VI. DISPOSAL OF RECORDS

The records of the RHC Trust shall be disposed of in such a manner as they are absolutely unusable by anyone. The manner of disposal shall be determined by the TPA.

VII. EXCEPTIONS

Destruction and/or disposal of relevant records under this Policy shall immediately cease upon the Board's receipt of a request under the Freedom of Information Act, if it is believed that an investigation or litigation is imminent, or if the Board is notified that an audit, investigation, or litigation has commenced.

VIII. REVIEW AND MODIFICATION

The Board shall review and propose any needed modifications to this policy as deemed necessary and appropriate.

IX. EFFECTIVE DATE

This policy shall take effect immediately upon its adoption by the Board.