

## DOCUMENT RETENTION AND DESTRUCTION POLICY

### *Maintenance of Records*

1. **Storage and Access to Records.** ALL GOD'S CHILDREN INTERNATIONAL ("AGCI") adoption files will be maintained in a manner best designed to ensure their confidentiality and to protect the records from loss, damage, or destruction. When not in use, case files, medical records, and adoption registry records will be kept in locked filing cabinets, or secured file storage facility called Iron Mountain.

Only authorized personnel will have access to files. No adoption records will remain out and/or accessible and available for general viewing, whether on desktops or elsewhere. Files are stored in two rooms, the Active filing room (families currently in the adoption process) and the Post filing room (families in the process of completing post adoption reports).

All files are color coded by country, with the following colors representing the respective countries:

- Blue – Bulgaria
- Red – China
- Yellow – Ethiopia
- Black – Guatemala
- Green – India
- Brown – Kazakhstan
- Light Blue – African American Infant Program (currently) and Nepal (formerly)
- Light Green – Oregon Foster Care Adoptions
- Orange – Vietnam

When a family completes their adoption, their Case Manager takes their file from the Active room, reviews the file to make sure it is complete, and files the file in the Post room. The family's file remains in the Post room for approximately one year, until all of their social worker written reports are complete. At this point the file is sent to the secure offsite file location. When a family's self-written post adoption reports arrive in the office, they are compiled by program for the year and then filed all at once with Iron Mountain. Off-site filing codes are kept for both the actual file and for the location of each self-report. Once all post adoption reports are complete, including self-written family assessments, the family is sent a closing letter.

Computer backups of all electronic case files, medical records and adoption registry records, as of 1997, are backed up monthly and stored offsite. A paper copy of all case files, medical records, and adoption registry records will be maintained off premises by AGCI once the client file closes. All records subject to this procedure will be stored in a manner that allows for the records to be located and retrieved, using an index system.

When a client file closes in one of our satellite offices and becomes in-active or the social worker completes all post adoption requirements, the entire client file, including electronic copies of documents, must be sent to the Portland office by a traceable carrier with a signature requirement upon delivery. All packages must be insured at a value of \$250.00. Once the package is received in the Portland office it will be signed for and given to the Social Service Department for archiving in the client files.

2. **Retention of Records.** AGCI files regarding child placement, disruption, and child and birth parent information -- including all adoption case files, adoption-related medical records, and adoption registry records -- will be retained permanently by AGCI. Applicant files that have not resulted in an adoptive placement will be retained for three years. General correspondence will be retained for three years. All employment and contractor files will be permanently retained. Publicity, newsletters, information appearing on websites, grant requests will be retained permanently. Articles of Incorporation, Bylaws, Annual Reports, and corporate minutes will be permanently retained. Contracts, leases, and agreements with non-clients will be retained for ten years after full performance. Accounting ledgers and journals, audit reports, balance sheets, profit and loss reports, tax and nonprofit filings, payroll records, insurance policies will be retained permanently. All other financial and business records will be retained for ten years.
3. **Transfer of Records.** In the event that AGCI ceases to provide adoption services, all retained adoption-related records will be transferred to a licensed adoption agency in the state where AGCI's retained adoption records are permanently stored. If an agency qualified and willing to accept AGCI's adoption records cannot be found, the records will be transferred to the Oregon Department of Human Services or the appropriate State agency in the state where AGCI is licensed. AGCI will notify the appropriate State agency, the accrediting entity, and the U.S. Secretary of State of any transfer of adoption records. The notice must be given within 30 days of when AGCI ceases to provide adoption services, and must specify to whom records will be transferred.