

# Record Retention Policy

## Policy:

Washington Vaccine Association (the “Association”) has been established by act of the Washington Legislature for the purpose of collecting and remitting adequate funds from health carriers and third party administrators for the cost of vaccines provided to certain children of the state of Washington. The Association will comply fully with all laws that relate to the conduct of its activities.

## Purpose:

This Record Retention Policy of the Association identifies the record retention responsibilities of board members, officers, consultants, staff, and volunteers for maintaining and documenting the storage and destruction of the Association’s documents and records.

## Procedures:

1. **Rules.** The Association’s board members, officers, consultants, staff, and volunteers are required to honor these rules:
  - a. Paper or electronic documents indicated under the terms for retention below will be transferred and maintained by the Association;
  - b. All other paper documents may be destroyed after three years;
  - c. All other electronic documents may be deleted from all individual computers, data bases, networks, and back-up storage after one year; and
  - d. No paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation.
  - e. The Associate does not receive Protected Health Information (PHI) except in conjunction with assessments. Any files or documents containing PHI periodically will be deleted from WVA records after WVA’s use is completed.
2. **Terms for Retention.**
  - a. Retain permanently:
    - i. Governance Records – Charter and amendments, Bylaws, other Organizational documents, and governing board and board committee minutes.

- ii. Tax Records – Filed state (if applicable) and federal tax returns/reports and supporting records, tax exemption determination letter and related correspondence, and files related to tax audits.
  - iii. Intellectual property records – Copyright and trademark registrations and samples of protected works.
  - iv. Financial records – Audited financial statements, attorney contingent liability letters.
  - v. Property records – correspondence, property deeds, assessments, licenses, rights of way, and property insurance policies.
- b. Until superseded:
- i. Vaccine assessment schedule.
- c. Retain for ten years:
- i. Pension and benefit records – Pension (ERISA) plan participant/beneficiary records, actuarial reports, related correspondence with government agencies, and supporting records.
  - ii. Government relations records – State and federal lobbying and political contribution reports and supporting records.
- d. Retain for six years:
- i. Lease, insurance, and contract/license records – Software license agreements, vendor, hotel and service agreements, independent contractor agreements, employment agreements, consultant agreements, and all other agreements (retain during term of the agreement and for six after the termination, expiration, and non-renewal of each agreement).
- e. Retain for four years:
- i. The Association must keep employment tax records for at least four years after the date the tax becomes due or is paid.
  - ii. Name, address, occupation, and social security number of each employee; Total compensation and date paid including tips and non-cash payments; Compensation subject to withholding for federal income, social security and Medicare tax; Pay period for each compensation period; Explanation of difference in total compensation and taxable compensation; Employees' W-4 Form; Dates of employment (beginning and ending); Employee tip reports; Wage continuation made to an absent employee by employer or third party; Details of fringe benefits

provided to employee; Copy of employee's request to use the cumulative method of wage withholding; Adjustments or settlement of taxes; Amounts and dates of tax deposits; Total compensation paid to employee during calendar year; Compensation subject to Federal Unemployment Tax Act; State unemployment contributions made; All information shown on 940; and Copies of returns filed.

- f. Retain for three years:
  - i. Employee/employment records (not already subject to four year retention)– Employee names, addresses, social security numbers, dates of birth, INS Form I-9, resume/application materials, job descriptions, dates of hire and termination/separation, evaluations, compensation information, promotions, transfers, disciplinary matters, pay rate, time/payroll records, leave/comp time/FMLA, employee contracts, engagement and discharge correspondence, documentation of basis for independent contractor status (retain for all current employees and independent contractors and for three years after departure of each individual).
- g. Retain for one year:
  - i. All other electronic records, documents and files – Correspondence files, past budgets, bank statements, publications, employee manuals/policies, procedures, survey information.
- f. Incident reports and accident claims filed against the Association by other parties, and by the Association against other parties.
  - ii. For accidents/incidents involving adults NOT resulting in claims—three years.
  - iii. For accidents/incidents involving adults resulting in claims—closure plus six years.
  - iv. For accidents/incidents involving minors NOT resulting in claims—age of majority plus three years.
  - v. For accidents/incidents involving minors resulting in claims—closure plus six years.
- g. Job-Related Illness and Injury Records information pertaining to job-related illness and injury be kept on file for five years. In cases of exposure to toxic substances or blood-borne pathogens, medical exam results must be retained for thirty years after the employee's termination.
- h. The Association and/or its subcontractor receives protected health information from providers administering pediatric vaccines in the course of the Association's dosage based assessment process. The

Association will preserve the confidentiality and security of all such protected health information and maintain subcontractor business associate agreements with its subcontractors requiring its subcontractors to maintain the privacy and security of all such information. The Association will destroy, and its subcontractors will agree to destroy all such protected health information obtained in the course of the assessment process.

- 3. Exceptions.** Exceptions to these rules and terms for retention may be granted by the Association's Executive Director or Chairman of the Board.