STATE OF VERMONT SPECIFIC RECORD SCHEDULE Issued to: Vermont State Housing Authority Published: 8/28/2024



AGENCY SPECIFIC RECORD SCHEDULE FOR: Vermont State Housing Authority

- Authority: A custodian of public records shall not destroy, give away, sell, discard, or damage any record or records in his or her charge, unless specifically authorized by law or under a record schedule, as defined in 3 V.S.A. § 117(a)(6), that has been approved by the State Archivist. (1 V.S.A. § 317a)
- Scope: This agency specific record schedule is applicable only to the records listed on this record schedule that are produced or acquired during the course of agency business. Records are any written or recorded information, regardless of physical form or characteristics, and includes electronic or digital records and data. (1 V.S.A. § 317)
- Use: This is an agency specific record schedule (SRS). The agency (Vermont State Housing Authority) may develop its own internal policies and procedures to assure that the requirements outlined in this record schedule are being applied across the agency. For records required to be retained until OBSOLETE, an internal policy that clearly states specific retention requirements that best meet the agency's administrative needs is highly advised. Specific Record Schedule (SRS) numbers shall be cited in all internal policies to demonstrate compliance with 1 V.S.A. § 317a.
- **Exemptions:** It is the policy of Title 1, Chapter 5, Subchapter 3 of Vermont Statutes Annotated to provide for free and open examination of records consistent with Chapter 1, Article 6 of the Vermont Constitution. All people, however, have a right to privacy in their personal and economic pursuits, which ought to be protected unless specific information is needed to review the action of a governmental officer. Some records listed on this record schedule may be exempt from public inspection and copying for this reason. Security measures to protect records and information from unauthorized access, use, and disclosure are necessary if the records are exempt pursuant to 1 V.S.A. §§ 315-320. Please see Appendix B for Access Requirements and Appendix E for related legal references regarding exemptions from public inspection and copying.
- **Retention:** This agency specific record schedule reflects the retention and disposition requirements for the following records regardless of their media, format, or mode of transmission. Duplicate records within the same agency that are used for specific legal, fiscal, or administrative purposes may be either retained using the retention requirement listed in this schedule or in accordance to an internal policy. Any copies of records made only for convenience of reference or informational purposes may be discarded when no longer needed unless otherwise directed through an internal policy. Duplicates or copies of records shall not be retained longer than the original records.

Adopted by: Signature on file. Signed by Executive Director Kathleen Berk on 8/28/2024

Kathleen Berk, Executive Director / Vermont State Housing Authority

Date

SRS-2095.1103: Continuum of Care Program Management Records

SRS-2095.1103: This schedule is reserved for recorded evidence of activities and transactions that relate to or affect, in a specific manner, the management of permanent housing projects as defined in 24 CFR 578. For records related to granting permanent housing project funds to subrecipients, use SRS-2095.1110: Permanent housing projects (Granting). For records related to participants of the permanent housing projects program, use, use SRS-2095.1022: Permanent housing projects (Coordinating).

Classification: Permanent housing projects (Managing)

Retention: Retain plans and reports until completed/closed, plus five (5) years, then destroy. Completed/closed means all funds from the grant have been expended.

Registers shall be retained until superseded with all required data types and data elements documented to ensure proper retention and preservation actions. Documentation shall also contain non-required data types and data elements, which shall be reviewed for continuing value prior to any data migrations relating to registers.

Other records shall be retained as specified in this schedule with the exception of transitory records. Transitory records created or received may be weeded as appropriate in accordance with GRS-1000.1000 (Transitory Records).

SPECIFIC RECORDKEEPING REQUIREMENTS for SRS-2095.1103 (see APPENDIX E for related legal references)

Record Category/Type:	Applicability/Use:	Appraised Value:	Retention/Disposition:
SRS-2095.1103.5	Use for formal agreements entered into by the housing	Temporary (Legal)	RETAIN UNTIL: Expired
Agreements	authority, such as memorandums of understanding. Includes significant supporting material.		PLUS: 5 Year(s)
Public Access: General			THEN: Destroy (General)
SRS-2095.1103.145	Use for time and effort logs.	Temporary (Legal)	RETAIN UNTIL: Superseded
Logs			PLUS: 5 Year(s)
Public Access: Redact			THEN: Destroy (Shred)
SRS-2095.1103.69	Use for plans related to the management of permanent housing	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Plans (reports)	projects. Includes significant supporting material.		PLUS: 5 Year(s)
Public Access: General			THEN: Destroy (General)

SRS-2095.1103.73 Procedures Public Access: <i>General</i>	Use for sets of instructions or procedures that govern the management of permanent housing projects. Includes significant supporting material.	Temporary (Legal)	RETAIN UNTIL: Superseded PLUS: 5 Year(s) THEN: Destroy (General)
SRS-2095.1103.81 Registers Public Access: <i>General</i>	Use for registers, databases and similar systems that provide for the systematic and regular recording of the continuum of care program.	Conditional Archival	RETAIN UNTIL: Superseded PLUS: 0 Year(s) THEN: Confirm
SRS-2095.1103.144 Reports Public Access: <i>General</i>	Use for reports created or received by the housing authority that document permanent housing projects management. Includes significant supporting material.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (General)

SRS-2095.1103 was approved by the Vermont State Archivist on 8/27/2024.

SRS-2095.1022: Continuum of Care Program Participant Records

SRS-2095.1022: This schedule is reserved for recorded evidence of activities and transactions that relate to or affect, in a specific manner, the coordination of permanent housing projects for program participants as defined in 24 CFR 578. For records related to granting permanent housing project funds to subrecipients, use SRS-2095.1110: Permanent housing projects (Granting). For records related to the management of permanent housing projects, use SRS-2095.1110: Permanent housing projects (Managing).

Classification: Permanent housing projects (Coordinating)

Retention: Retain agreements, applications, decisions, reports, and supporting material until completed/closed, plus five (5) year, then destroy. Completed/closed means the program participant is no longer receiving services or assistance and all funds from the grant under which the program participant was served have been expended.

Registers shall be retained until superseded with all required data types and data elements documented to ensure proper retention and preservation actions. Documentation shall also contain non-required data types and data elements, which shall be reviewed for continuing value prior to any data migrations relating to registers.

Other records shall be retained as specified in this schedule with the exception of transitory records. Transitory records created or received may be weeded as appropriate in accordance with GRS-1000.1000 (Transitory Records).

Record Category/Type:	Applicability/Use:	Appraised Value:	Retention/Disposition:
SRS-2095.1022.5	Use for supportive service agreements.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Agreements			PLUS: 5 Year(s)
Public Access: <i>Redact</i>			THEN: Destroy (Shred)
SRS-2095.1022.8	Use for applications submitted by persons requesting	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Applications	enrollment for permanent housing project assistance and services. Includes significant supporting materials.		PLUS: 5 Year(s)
Public Access: <i>Redact</i>	· · · · · · · · · · · · · · · · · · ·		THEN: Destroy (Shred)
SRS-2095.1022.141	Use for authorizations related to the coordination of program	Temporary (Legal)	RETAIN UNTIL: Expired
Authorizations	participants enrollment or eligibility. Includes releases, authorized representations, waivers, and similar records.		PLUS: 5 Year(s)
Public Access: <i>Redact</i>			THEN: Destroy (Shred)

SPECIFIC RECORDKEEPING REQUIREMENTS for SRS-2095.1022 (see APPENDIX E for related legal references)

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SRS-2095.1022.133 Decisions Public Access: <i>Redact</i>	Use for written evidence of a final decision related to the coordination of program participants enrollment or eligibility. Includes determination appeals and supporting material.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (Shred)
SRS-2095.1022.50 Notices, Legal Public Access: <i>Redact</i>	Use for notifications issued or received related to the coordination of program participants enrollment and eligibility. Includes verification notices, renewal notices, and other similar records.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 1 Year(s) THEN: Destroy (Shred)
SRS-2095.1022.81 Registers Public Access: <i>Redact</i>	Use for registers, databases, systems, and similar records that provide for the systematic and regular recording of information related to the coordination of program participants enrollment and eligibility.	Conditional Archival	RETAIN UNTIL: Superseded PLUS: 0 Year(s) THEN: Confirm
SRS-2095.1022.144 Reports Public Access: <i>Redact</i>	Use for reports related to the coordination of program participants enrollment and eligibility. Includes program participants financial reports.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (Shred)
SRS-2095.1022.36 Supporting material Public Access: <i>Redact</i>	Use for records created or received to support, supplement, or complement applications for the coordination of program participants enrollment or eligibility.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (Shred)

SRS-2095.1022 was approved by the Vermont State Archivist on 8/27/2024.

SRS-2095.1110: Continuum of Care Program Subrecipient Agreement Records

SRS-2095.1110: This schedule is reserved for recorded evidence of activities and transactions that relate to or affect, in a specific manner, the granting of permanent housing projects funds to subrecipients as defined in 24 CFR 578. For records related to participants of the permanent housing projects program, use SRS-2095.1022: Permanent housing projects (Coordinating). For records related to the management of permanent housing projects, use SRS-2095.1110: Permanent housing projects (Managing).

Classification: Permanent housing projects (Granting)

Retention: Retain audits, invoices, reports and supporting material until completed/closed, plus five (5) year, then destroy. Completed/closed means all funds from the grant have been expended.

Registers shall be retained until superseded with all required data types and data elements documented to ensure proper retention and preservation actions. Documentation shall also contain non-required data types and data elements, which shall be reviewed for continuing value prior to any data migrations relating to registers.

Other records shall be retained as specified in this schedule with the exception of transitory records. Transitory records created or received may be weeded as appropriate in accordance with GRS-1000.1000 (Transitory Records).

SPECIFIC RECORDKEEPING REQUIREMENTS for SRS-2095.1110 (see APPENDIX E for related legal references)

Record Category/Type:	Applicability/Use:	Appraised Value:	Retention/Disposition:
SRS-2095.1110.5	Use for the formal written agreement between the housing	Temporary (Legal)	RETAIN UNTIL: Expired
Agreements	authority and the subrecipient outlining the terms, conditions and amounts of the grant. Includes amendments and related		PLUS: 5 Year(s)
Public Access: General	supporting materials.		THEN: Destroy (General)
SRS-2095.1110.10	Use for internal audit reports and audits submitted to the	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Audits	housing authority as required by the grant agreement.		PLUS: 5 Year(s)
Public Access: General			THEN: Destroy (General)
SRS-2095.1110.49	Use for original invoices from subrecipients. Includes significant	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Invoices	supporting materials.		PLUS: 5 Year(s)
Public Access: Redact			THEN: Destroy (Shred)

SRS-2095.1110.81 Registers Public Access: <i>General</i>	Use for registers, databases and similar systems that provide for the systematic and regular recording of granting activities.	Conditional Archival	RETAIN UNTIL: Superseded PLUS: 0 Year(s) THEN: Confirm
SRS-2095.1110.144 Reports Public Access: General	Use for reports required by subrecipient agreement, including financial and monitoring reports. For final reports received from subrecipients that have significant administrative value, retain permanently and use the retention requirements for Reports in GRS-2084.1102 (Public Bodies Administrative Records).	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (General)
SRS-2095.1110.36 Supporting material Public Access: <i>General</i>	Use for supplemental and supporting documents pertinent to an award that are not otherwise specified in this schedule.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 5 Year(s) THEN: Destroy (General)

SRS-2095.1110 was approved by the Vermont State Archivist on 8/27/2024.

SRS-1873.1022: Section 8 Client Files

SRS-1873.1022: This schedule is reserved for recorded evidence of activities and transactions that relate to or affect, in a specific manner, the provision and coordination of tenant-based and project-based assistance as it pertains to enrollment and eligibility.

Classification: Covered housing assistance (Coordinating)

Retention: Retain all records listed on this schedule, except for authorizations and contracts, until completed/closed, plus an additional three (3) years, then destroy.

Retain authorizations and contracts until they are expired, plus an additional three (3) years, then destroy.

Transitory records created or received as part of the coordination of covered housing assistance, may be weeded as appropriate in accordance with SRS-1911.1000 (Public Housing Agency Transitory Records).

SPECIFIC RECORDKEEPING REQUIREMENTS for SRS-1873.1022 (see APPENDIX E for related legal references)

Record Category/Type:	Applicability/Use:	Appraised Value:	Retention/Disposition:
SRS-1873.1022.8	Use for applications submitted by persons and/or owners	Temporary (Legal)	RETAIN UNTIL: Completed/Closed
Applications	requesting enrollment for covered housing assistance. Includes significant supporting materials such as evidence of community		PLUS: 3 Year(s)
Public Access: <i>Redact</i>	service and tenant agreements to comply with service requirements.		THEN: Destroy (Shred)
SRS-1873.1022.141	Use for authorizations related to the coordination of tenant-	Temporary (Legal)	RETAIN UNTIL: Expired
Authorizations	based and project-based assistance enrollment or eligibility. Includes client releases, authorized representations, and similar records. Includes waivers.		PLUS: 3 Year(s)
Public Access: <i>Redact</i>			THEN: Destroy (Shred)
SRS-1873.1022.26	Use for contracts, leases, and similar agreements between the	Temporary (Legal)	RETAIN UNTIL: Expired
Contracts	Vermont State Housing Authority and a dwelling unit owner. Includes significant supporting materials.		PLUS: 3 Year(s)
Public Access: Exempt	5 11 <u>5</u>		THEN: Destroy (Shred)

SRS-1873.1022.133 Decisions Public Access: <i>Redact</i>	Use for written evidence of a final decision related to the coordination of tenant-based and project-based assistance enrollment or eligibility. Includes rental certificates and vouchers; and supporting materials such as information packets for selected families and requests for tenant lease approval.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (Shred)
SRS-1873.1022.50 Notices, Legal Public Access: General	Use for notifications issued or received related to the coordination of tenant-based and project-based assistance enrollment and eligibility. Includes verification notices, renewal notices, and other similar records.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (General)
SRS-1873.1022.81 Registers Public Access: <i>Redact</i>	Use for registers, databases, systems, and similar records that provide for the systematic and regular recording of information related to the coordination of tenant-based and project-based assistance enrollment and eligibility. Includes waiting lists.	Temporary (Legal)	RETAIN UNTIL: Superseded PLUS: 3 Year(s) THEN: Destroy (Shred)
SRS-1873.1022.144 Reports Public Access: <i>Redact</i>	Use for reports related to the coordination of tenant-based and project-based assistance enrollment and eligibility. Includes client financial reports.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (Shred)
SRS-1873.1022.36 Supporting material Public Access: <i>Redact</i>	Use for records created or received to support, supplement, or complement applications for the coordination of tenant-based and project-based assistance enrollment or eligibility.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (Shred)

SRS-1873.1022 was approved by the Vermont State Archivist on 11/4/2020.

Appendix A: Appraisal Values

An appraisal value establishes the usefulness or importance of a record after its original purpose has passed. The value of a record also dictates how it must be disposed after retention requirements are met (also see "Retention Requirements"). The appraisal values below represent categories of values that may be assigned to records following the record appraisal process. See "Vermont Archival Records" in the Archives and Records Management Handbook for conditions a record must meet to be appraised as "archival."

Appraisal Value	Description	Usage
Conditional Archival	Records may have archival value.	Assigned to records that meet the conditions of a "Vermont Archival Record" under special conditions.
Permanent (Archival)	Records have archival value.	Assigned to records that meet the conditions of a "Vermont Archival Record" and are therefore permanent (archival) records.
Temporary (Administrative)	Records have temporary administrative value.	Assigned to records that do not meet the conditions of a "Vermont Archival Record" but are needed for administrative reasons.
Temporary (Legal)	Records have temporary legal value.	Assigned to records that do not meet the conditions of a "Vermont Archival Record" but have legal requirements governing their retention.
Unappraised	Default value for records that have not been appraised.	Assigned to records that have not been appraised and do not yet have retention or disposition requirements.

Appendix B: Public Access Requirements

A public access requirement is the availability of a record for public use and inspection pursuant to 1 V.S.A. § § 315-320. Unless exempt from public inspection and copying pursuant to 1 V.S.A. § 317, records are expected to be promptly produced for public inspection upon request. Public agencies shall follow the procedure outlined in 1 V.S.A. § 318. The access requirements below represent actions agencies must take based on specific laws associated with the accessibility of their records. With general record schedules, the default requirement is always REVIEW unless it is clear that certain records or information within a record are exempt from public use and inspection pursuant to 1 V.S.A. § 317. Agencies using general record schedules should defer to their internal policies for specific access requirements.

Access	Description	Usage
Exempt	Records shall not be provided for free and open examination pursuant to 1 V.S.A. §§ 315-320.	Assigned to records that are wholly exempt from public use and inspection pursuant to 1 V.S.A. § 317.
General	Records may be provided for free and open examination pursuant to 1 V.S.A. §§ 315-320.	Assigned to records that are not exempt from public inspection and copying pursuant to 1 V.S.A. § 317.
Redact	Records contain specific information that shall not be provided for free and open examination pursuant to 1 V.S.A. §§ 315-320.	Assigned to records that contain specific information that is exempt from public inspection and copying pursuant to 1 V.S.A. § 317 and require exempt information to be redacted from the records prior to public use, inspection and/or copying.
Review	Records may be provided for free and open examination pursuant to 1 V.S.A. §§ 315-320 but not always. Default value for general schedules, which require agencies to establish internal policies.	Assigned to records that are generally not exempt from public inspection and copying pursuant to 1 V.S.A. § 317 but, in limited circumstances, may be exempt. Internal review and/or policy is required.

Appendix C: Retention Requirements

A retention requirement is the length of time a record must be retained by an agency before it may be destroyed or transferred to the State Archives or an agency archives (also see "Disposition Requirements"). The retention requirements below represent events or triggers that cause records to move from an active to inactive state. An "event" is tied to a specific time requirement: i.e. Retain Until "Calendar Year Ends" PLUS 3 Years.

Retention	Description	Usage
Audit Complete	Retain until an audit or verification is complete.	Assigned to records that are actively used or needed until the information contained therein has been audited or verified.
Calendar Year Ends	Retain until the end of the calendar year.	Assigned to records that are actively used or needed until the end of the calendar year.
Completed/Closed	Retain until the activity or process supported by the record is completed.	Assigned to records that are actively used or needed until the activity is formally completed, closed, or finalized (includes appeals).
Expired	Retain until the conditions or requirements supported by the record are satisfied and no further action is needed.	Assigned to records that are actively used or needed until the conditions or requirements are satisfied and complete.
Fiscal Year Ends	Retain until the end of the fiscal year.	Assigned to records that are actively used or needed until the end of the fiscal year.
Life of Asset Ends	Retain for the life of the person, structure, object, organization, etc. that is the subject of the record.	Assigned to records that are actively used or needed for the life of person, structure, object, organization, etc.
Obsolete	Retain until the record is no longer needed and is valueless.	Assigned to records that have limited administrative value and may be purged when they no longer have any administrative value. Agency must develop internal policy that states when records no longer have administrative value.
Superseded	Retain until the record is superseded, updated, or revised.	Assigned to records that will be superseded, updated, or revised.

Appendix D: Disposition Requirements

A disposition requirement is how an agency must dispose of a record from its legal custody once retention requirements have been met. Disposition is based on the record's appraisal value. If the record has been appraised as non-archival it will be destroyed after retention requirements are met. If appraised as archival the record will be transferred to the State Archives or agency archives for permanent preservation and access. The disposition requirements below represent actions that an agency must take once a record has met its retention requirements.

Disposition	Description	Usage
Archives	Retain permanently. These records are eligible for transfer to the State Archives or agency archives.	Assigned to records that have been appraised as having archival value and are therefore permanent records.
Confirm	Confirm disposition with the Vermont State Archives and Records Administration after retention requirement has been met.	Assigned to records that are maintained in a centralized database or information system or are appraised as conditional archival.
Destroy (General)	Destroy by recycling or deleting the record.	Assigned to records that have been appraised as non-archival and are not exempt from public access. Agency discretion advised for general record schedules.
Destroy (Shred)	Destroy by shredding (includes electronic shredding).	Assigned to records that have been appraised as non-archival and are exempt from public access or contain sensitive information.
Unappraised	Default value for records that have not been appraised.	Assigned to records that have not been appraised and do not yet have retention or disposition requirements.
Weed	Separate records that meet the conditions of a "Vermont Archival Record" from those that do not (temporary).	Assigned to records that have been appraised as conditional archival. Upon weeding the temporary records from the archival records, transfer archival records to Archives and destroy temporary records.

Appendix E: Legal References

SRS-2095.1103:	Continuum of Care Program Management Records	Review for Exemption?
24 CFR 578	Continuum of care program	Yes
24 V.S.A. § 4005	Vermont state housing authority, establishment, members, powers	No
SRS-2095.1022:	Continuum of Care Program Participant Records	Review for Exemption?
24 CFR 578	Continuum of care program	Yes
24 V.S.A. § 4005	Vermont state housing authority, establishment, members, powers	No
SRS-2095.1110:	Continuum of Care Program Subrecipient Agreement Records	Review for Exemption?
24 CFR 578	Continuum of care program	Yes
24 V.S.A. § 4005	Vermont state housing authority, establishment, members, powers	No
SRS-1873.1022:	Section 8 Client Files	Review for Exemption?
15 U.S.C. § 1681b	Permissible purposes of consumer reports [related to comnsumer credit protectio	n] Yes
2 CFR 200	Uniform administrative requirements, cost principles, and audit requirements for f awards	ederal Yes
24 CFR 15	Public access to HUD records under the freedom of information act and testimon production of information by HUD employees	y and Yes
24 CFR 960	Admission [related to admission to, and occupancy of public housing]	No
24 CFR 982	Section 8 tenant-based assistance: housing choice voucher program	No
24 CFR 983	Project-based voucher (PBV) program	No
24 CFR 984	Section 8 and public housing family self-sufficiency program	No
	Vermont state housing authority, establishment, members, powers	

24 V.S.A. § 4010	Duties [related to housing authorities]	No
26 U.S.C. § 6103	Confidentiality and disclosure of returns and return information	Yes
42 U.S.C. § 13604	Assisted applications [related to standards and obligations of residency in federally assisted housing]	No
42 U.S.C. § 1437a	Rental payments [related to general program of assisted housing]	No
42 U.S.C. § 1437d	Contract provisions and requirements; loans and annual contributions	Yes
42 U.S.C. § 1437e	Designated housing for elderly and disabled families	No
42 U.S.C. § 1437f	Low-income housing assistance	No
42 U.S.C. § 1437j	Labor standards and community service requirement	No
42 U.S.C. § 1437n	Eligibility for assisted housing	No
42 U.S.C. § 1437v	Demolition, site revitalization, replacement housing, and tenant-based assistance grants for projects	No
42 U.S.C. § 1437z	Exchange of information with law enforcement agencies	No
42 U.S.C. § 290dd-2	Confidentiality of records [related to miscellaneous provisions relating to substance abuse and mental health]	Yes
9 V.S.A. § 2440	Social security number protection	Yes