

CATHOLIC CHARITIES OF THE ARCHDIOCESE OF OKLAHOMA CITY, INC.

RECORD RETENTION POLICY

Catholic Charities follows all applicable laws and regulations regarding the retention of records by the agency. The following chart shows the current policy for each type of record.

RECORDS	LAW	RETENTION REQUIREMENTS
Payroll (time sheets, payroll registers, etc...)	FLSA (Fair Labor Standards Act); Equal Pay Act	Three years for payroll info
Leaves of Absence (documentation to support, dates, hours used, company policies, benefits)	FMLA (Family Medical Leave Act)	Three years
Job Applications, Personnel transaction forms, personnel records	ADEA (Age Discrimination in Employment Act); ADA (Americans with Disabilities Act); Title VII (Civil Rights Act of 1964)	One year
Job Applications, Personnel transaction forms, personnel records for FEDERAL CONTRACTORS	Executive Order 11246; Rehabilitation Act of 1973; Uniform Guidelines on Employee Selection Procedures	One year if company has fewer than 150 employees
Affirmative Action Program documents	Executive Order 11246; Rehabilitation Act of 1973; Vietnam Era Veterans' Readjustment Assistance Act	One year if company has fewer than 150 employees; Two years if 150+ 2 years if adverse impact is detected
I-9 Forms	IRCA (Immigration Reform & Control Act)	Three years after date of hire or one year after date of termination, whichever is later.
Notice of COBRA rights	COBRA (Consolidated Omnibus Budget Reconciliation Act)	One year after date of termination or through period of COBRA use of benefits, whichever is later
Requests for reasonable accommodation	ADA	One year from the personnel action
Occupational injuries and illness records	OSHA (Occupational Safety & Health Act)	Five years
EEOC charges or employment claims resulting in litigation	Title VII; ADEA; FMLA; ADA	Maintain until litigation is resolved
Pension and Welfare Plans; SPD; annual reports; notices of changes; plan termination notices	ERISA (Employee Retirement Income Security Act)	Six years
Polygraph test results and reports	Employee Polygraph Protection Act	Three years
Records relating to tax withholding	FICA; FUTA	Four years from the date tax is due or tax is paid

Client Documents

PROGRAM RECORDS	GOVERNING AGENCIES	RETENTION REQUIREMENTS
Case Management	COA	The longer of seven (7) years from file close or the age of majority
Counseling	COA, Oklahoma State Board of Behavioral Health Licensure	The longer of seven (7) years from file close or the age of majority
Legal Cases	COA, Oklahoma Bar Association	The longer of seven (7) years from file close or the age of majority
Adoption	Oklahoma DHS, COA	Permanent

*Catholic Charities does not consider a minor a client if the minor is not directly receiving services from CCAOKC independent of their guardian.

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