



Columbiana Metropolitan Housing Authority

325 Moore St., East Liverpool, OH 43920

Tenant/Client Record Retention and Disposal

1.0 Basic Policy on Record Retention

1. Rules about record retention are the same whether the records are paper or electronic. The rules relate to what you must save, not how you must save it.
2. Federal Public Housing tenant files and Project-based and Housing Choice Voucher client files are governed by the HUD regulations on retention – what must be in each file and how long material must be retained.
3. The rules vary for active files – files of public housing tenants and HCV/PBV clients who still live in public housing or are assisted with a voucher – and the files of “vacated tenants/clients” who are no longer receiving any assistance.
4. HUD regulations require that each active tenant and client file contain the most recent three years’ worth of information plus the original application package. See the **Procedure on Maintaining Tenant/Client Records** for what must be filed and the file protocol:
 - a. The original application for assistance (public housing, PBV or the HCV Program) with all basic information and the verifications that documented the family’s eligibility for assistance¹;
 - b. The most recent and the two previous annual recertification packages with all the back-up verifications and other documentation to support each 50058 submitted;
 - c. Interim adjustments to rent, again with all back-up verifications (and the 50058) in the same three-year period;
 - d. All older materials about active tenants/clients may be archived off-site until the tenant/client leaves the program with the exception of Leases/HAP contracts and supporting documentation for HCV clients who have lived in the same unit for more than 3 years. Documentation about the current unit will be retained even if it is substantially more than 3 years old;
 - e. Active tenant files older than 3 years (other than the original application materials) may either be stored on-site (if appropriate space is available) or may be properly boxed, labeled and sent to a secure storage facility.

¹ An auditor should be able to look at any active tenant/client file and determine that the assisted family was eligible when admitted to the program.





5. Records of “vacated” tenants/clients must be stored for three years. How they are handled after that three-year period depends upon the tenant/client’s status when they left the program.
6. Tenants or clients who left the public housing, PBV or voucher program in “bad standing” are those who left the respective programs owing CMHA money or who were verified to be in non-compliance with program requirements and were facing lease termination in the public housing or PBV program or termination of assistance in the HCV program.
 - a. Examples include but are not limited to:
 - 1) Tenant or client is verified to owe CMHA money for rent, charges in addition to rent, or overpayment of subsidy because of verified misrepresentation of information by the tenant/client or other documented reasons;
 - 2) Tenant or client was facing lease termination or termination of assistance for recent verified drug-related or violent criminal activity by a member of the assisted family;
 - 3) Tenant or client was facing lease termination or termination of assistance for a verified situation in which tenant’s/client’s housekeeping was verified to create threats to health or safety of tenant/client family and/or neighbors;
 - 4) Tenant or client was facing lease termination or termination of assistance for permitting unauthorized individuals to live in tenant’s/client’s home without permission from CMHA;
 - 5) Tenant or client was facing lease termination or termination of assistance for other serious or repeated lease violations or other good cause or termination of assistance for eviction for serious lease violations or violations of “Family Obligations”.
 - b. For tenants and clients who left CMHA’s program in bad standing, the sections of the former tenant files that document the tenant/client violations of program rules must be retained in active status indefinitely. The remaining information in tenant/client files that is unrelated to money owed or behavior that violated program rules may be shredded three years after the family leaves CMHA’s programs.
 - c. Amounts owed to CMHA when tenants/clients left the program are owed until they are repaid in full, whether or not such amounts are “written off” CMHA’s tenant accounting system.
 - d. All former tenants who were adults (age 18 or older) when the family moved out of CMHA assisted housing, not just the head, co-head and spouse, are responsible for such debts until they are repaid in full.





7. The files of tenants or Clients who left the public housing or HCV program in good standing shall be shredded three years after they leave the program. Do not continue to store such files.
 - a. The ONLY acceptable means of disposing of tenant/client files is through shredding because tenant and client files contain information that could be used for identity theft.
 - b. Documents may be shredded using a guaranteed shredding service.

