



## RESOLUTION 2025-04-23 (5)

**Date:** April 23, 2025

**To:** THA Board of Commissioners

**From:** April Black  
Executive Director

**Re:** Approval of Public Records Retention Policy

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*This resolution would establish agency-wide policies and procedures for effective management of Tacoma Housing Authority (THA) records in accordance with Washington's records retention laws.*

### BACKGROUND

Washington state law requires that all agencies appropriately retain, store, archive, and dispose of all public records in accordance with schedules approved by the Local Records Committee after the records no longer serve an active business purpose.

### RECOMMENDATION

Approve Resolution 2025-04-23 (5) authorizing THA to establish agency-wide policies and procedures for effective management of THA records.



## **RESOLUTION 2025-04-23 (5)**

(Approve Public Records Retention Policy)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

**WHEREAS**, Washington state law requires that all agencies appropriately retain, store, archive, and dispose of all public records in accordance with schedules approved by the Local Records Committee after the records no longer serve an active business purpose; and

**WHEREAS**, This Records Retention Policy establishes agency-wide policies and procedures for effective management of Tacoma Housing Authority (THA) records in accordance with Washington's records retention laws; and

***Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington that:***

Approve Resolution 2025-04-23 (5) authorizing THA to establish agency-wide policies and procedures for effective management of THA records.

**Approved: April 23, 2025**



**Derek Young, Chair**



# TACOMA HOUSING AUTHORITY

<b>Policy No.</b>	L-02
<b>Policy</b>	Public Records Retention
<b>Date</b>	April 23, 2025

## 1. Purpose

Washington state law requires that all agencies appropriately retain, store, archive, and dispose of all public records in accordance with schedules approved by the Local Records Committee after the records no longer serve an active business purpose.

This Records Retention Policy establishes agency-wide policies and procedures for effective management of Tacoma Housing Authority (THA) records in accordance with Washington's records retention laws. Implementation of this policy should help ensure the following:

- Records are filed and maintained in accord with standard filing practices;
- Records are disposed of after the end of the retention period specified on the applicable Records Retention Schedule;
- Records essential to THA governance and operations are adequately protected against damage;
- THA will be able to recover or replace records damaged or lost in a disaster;
- Records of historical value are preserved and transferred to archival custody; and,
- Records are available for public inspection consistent with the provisions of the Public Records Act, ch. 42.56 RCW.

Except where the procedures are required by statute, the procedures in this policy are advisory only and do not impose any affirmative duty on THA. THA reserves the right to decide how to interpret and apply this policy and may change it at any time.

## 2. Sources for Policy

- *Chapter 40.14 RCW*

## 3. Scope of Policy

This policy applies to all THA employees, officials, and volunteers.

## 4. Who is Responsible for Implementing Policy

Who	Responsibilities
Records Manager	The Records Manager of THA shall be tasked with administering and updating this Records Retention Policy.
	The Records Manager and the IT Department will also



	<p>coordinate regarding protection and management of THA's Essential Records (as defined in the Retention Schedules), including security backup and disaster preparedness.</p> <p>The Records Manager will coordinate with the Washington State Archives as appropriate regarding the retention, management, and archival of THA's records in compliance with the Retention Schedules and state retention laws.</p>
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## 5. Definitions

<i>Public Records</i>	<p>Records that THA creates and records that THA receives or collects in connection with the transaction of public business, regardless of the record's physical form or characteristics. For example, when THA solicits public comment on an issue, both the request for comment and any comments received in response are public records.</p>
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## 6. Policy

THA shall retain, store, archive, and dispose of all public records according to their retention periods, as outlined in:

- The Local Government Common Records Retention Schedule ("CORE"), available at: <http://www.sos.wa.gov/archives/RecordsManagement/UsingtheLocalGovernmentCommonRecordsRetentionScheduleCORE.aspx>. and
- The Housing Authorities Records Retention Schedule, available at <https://www.sos.wa.gov/archives/recordsmanagement/previous-versions-of-housing-authorities-schedule.aspx>

These schedules are referred to collectively in this policy as the "Retention Schedules".

Some public records have a higher retention value and must be stored for several years or permanently according to their retention periods. Other public records have a lower retention value and can be stored for shorter retention periods or disposed of immediately. Records that do not fall under the statutory definition of "public record" in RCW 40.14.010 are not subject to public records retention requirements. Note that the definition of "public records" for retention purposes differs from the statutory definition of "public records" for disclosure purposes under ch. 42.56 RCW (the Public Records Act). THA employees, officials, and volunteers should refer to THA's Public Records Request Policy for matters concerning the disclosure of public records.

This Records Retention Policy is secondary to any current public records requests for the records and/or any legal hold notices for records in response to potential litigation. Sensitive and confidential data must also be protected from disclosure in accordance with applicable federal and state law.

## **6.1 LEGAL PROVISIONS**

### **A. Records as Public Property**

All public records created, received, or used by THA employees or officials in the scope of their work for THA shall be and remain the property of THA. Outgoing officials and employees must pass records on to their successors. Before leaving employment, volunteer positions, or elected office, employees, volunteers, and officials must search for any public records in their personal possession, including public records located on personal (non-THA) cell phones, devices, or accounts, and transmit copies of any public records to THA. Public records shall be preserved, stored, transferred, destroyed, and otherwise managed according to the provisions of ch. 40.14 RCW unless otherwise provided by law.

### **B. Custody of Public Records**

Public records must remain in the custody of the agency in which they were originally created or received. Accordingly, THA records shall not be placed in the custody of any other person or agency, public or private, or released to individuals, except for disposition pursuant to law or as otherwise provided by law.

### **C. Disposition of Public Records**

Public records may be destroyed or transferred only in accordance with the instructions and approval of the Washington State Local Records Committee, which publishes the various Retention Schedules noted in this policy. The Washington State Archives strongly recommends the disposition of public records at the end of their minimum retention periods for the efficient and effective management of agency resources.

### **D. Illegal Destruction of Public Records**

Any person who willfully and unlawfully removes, alters, mutilates, destroys, conceals, or obliterates a record, map, book, paper, document, or other public record is subject to criminal prosecution (class C felony, punishable by imprisonment in a state correctional facility for up to five years, or by a fine of not more than one thousand dollars, or by both).

## **6.2 GENERAL POLICIES REGARDING DEVICE USAGE AND TRANSACTION OF THA BUSINESS**

### **A. THA-Managed Devices and Accounts**

Whenever possible, THA employees and officials should use THA systems (e.g., THA's email and network, THA-issued devices, and THA-approved document sharing platforms) to generate and receive records related to THA business. Employee-owned devices (laptops, tablets, mobile phones, etc.) may be used to send and receive work email so long as the messages are routed

through THA's email system. Use of personal (non-THA) email accounts for conducting THA business is prohibited, except in special circumstances in which the individual has no reasonable alternative or has specific permission from their supervisor to use personal email for THA business.

In the event an email related to THA business is sent from or received at a personal email address, the message should immediately be copied and/or forwarded to the THA email system so that the communication is searchable by records staff and retained pursuant to this policy. Similarly, voicemails received on a personal phone should be immediately forwarded to THA systems if the voicemail needs to be retained as evidence of a business transaction or if it falls within a specific record series in the Retention Schedules (e.g., citizen complaint).

### **B. Texting and Instant Messaging**

Texts and instant messages (e.g., Microsoft Teams messages) related to THA business are public records. This includes all messages sent and received on THA devices or accounts as well as any THA business messages stored on personal (non-THA) devices or accounts. These records should be managed according to the applicable retention schedules as with any other type of electronic record.

Refer to Section 6.4 for retention procedures related to texting and instant messaging.

## **6.3 USING RETENTION SCHEDULES**

The Retention Schedules provide authority and direction for the timely disposal of THA records. The schedules identify and describe various types of records by category and provide a retention period to allow for systematic removal and proper disposition of inactive or obsolete records.

The Retention Schedules identify, for example, the following:

- Instructions and general guidance
- Categories and subcategories of record types (e.g., Asset Management, Accounting, Human Resources, Budget, Payroll, Meetings and Hearings)
- Descriptions of particular record types and examples (e.g., Performance Reviews)
- Retention and disposition actions (e.g., retain for 6 years after creation and then destroy)
- Designation of record types as Archival, Essential, etc. (e.g., "Archival" records must not be destroyed)
- Special instructions
- Information for records management personnel (such as disposition numbers for logging destruction)

The Retention Schedules prescribe the minimum required retention periods. Records can be destroyed or archived after the minimum retention period unless they are needed for any of the following: (1) pending litigation; (2) pending records request that applies to the record; or (3) completion of an audit.



## 6.4 RETENTION AND DISPOSITION PROCEDURES

### A. Instructions for Processing Printed and Hard Copy Documents

THA endeavors to be a “paperless” agency to the extent practicable. Paper documents are often printouts or working copies of records that exist in electronic form and therefore the paper copies have minimal retention value. Please refer to Subsection C below for guidance on transitory records and secondary (duplicate) copies, which are concepts applicable to both electronic records and paper records. If a paper record is transitory as defined in Section 6.2.1, it should be disposed of as soon as it has served its purposes.

For paper records that are not transitory, the following procedures should be used:

1. Determine the record’s retention period and status as “Archival” or “Non-Archival” by using the Retention Schedules;
2. If the record is Non-Archival and has a retention period of Life of the Agency or Permanent, the record should be provided to the Records Manager for proper retention and backup as recommended by the Washington State Archives (e.g., ch. 434-677 WAC);
3. If the record has met its retention requirement, proceed based on the record’s archival designation.
  - a. Archival (Permanent Retention): provide the record to the Records Manager for proper handling and transfer to the Washington State Archives.
  - b. Archival (Appraisal Required): provide the record to the Records Manager for proper handling and appraisal by the Washington State Archives for further retention or disposition.
  - c. Non-Archival (and does not have a retention period of “Life of the Agency” or “Permanent”): securely dispose of the record.
4. If the record has not yet met its retention requirement, the record should be digitized in compliance with Washington State Archives requirements and procedures, which then allow for destruction of the original paper record if it is Non-Archival. See Washington State Archives, Requirements for the Destruction of Paper Records after Imaging (“Plan to Scan”). Paper records designated as Archival should only be destroyed under the guidance of the Records Manager. Once digitized, the electronic copy of the record must be maintained for the remainder of its retention period.

### B. Instructions for Processing Email, Texts, and Other Electronic Communications

Email and other electronic forms of communication (e.g., text messages, Microsoft Teams messages) used as a means of conducting THA business must meet records retention requirements before they can be destroyed, deleted, erased, or transferred to the Washington State Archives. Some messages may be transitory in nature and have minimal retention value.

Others may be formal and substantive documents, or may also have separate attachments, all of which need to be appropriately processed.

There is no generic or general retention period for emails or other forms of electronic communication. A record's content (including its substantive text, attachments, and associated metadata), not its format, determines how long the record is retained.

### **C. Destruction of Email and Other Electronic Communications**

THA employees and officials shall delete transitory emails, text messages, and other electronic communications that have no administrative, legal, fiscal, or archival requirements for retention as soon as those records have served their purposes.

**Transitory records** are those that only document information of temporary, short-term value, and are (A) not needed as evidence of a business transaction and (B) not covered by a more specific record type under the retention schedules. Examples of electronic communications that may be transitory records include, but are not limited to:

1. Miscellaneous notices or memoranda unrelated to the functional responsibility of THA (e.g., traffic advisories, notices of community affairs, holidays, etc.);
2. Announcements of social events, such as retirement parties or celebrations;
3. Personal messages and announcements unrelated to official business (though these types of messages may contain evidence or historical material, which then should be retained);
4. Preliminary drafts that do not represent significant basic steps in the preparation of record document(s);
5. Electronic messages (email, text, voicemail, or otherwise) that do not have long-term substantive value (e.g., "Please call me back" or "I'm running late"); note: messages that evidence a business transaction or fall within a specific record series (e.g., citizen complaint) must be retained accordingly;
6. Information-only copies or extracts of documents distributed for convenience or reference;
7. Published reference materials;
8. General information received from other agencies, commercial firms, or private institutions that requires no action, including catalogs, reports, multimedia presentations, newsletters, and unsolicited information; and
9. Copies of inter- or intra-agency memoranda, bulletins, or directions of a general information and non-continuing nature.



#### **D. Retention Responsibility and Storage of Electronic Records**

The **sender** is responsible for retaining the primary record copy of the email or other electronic communication sent from **within** THA. The **recipient** is responsible for retaining emails or other electronic communications that originate **outside** of THA.

THA employees and officials shall file retained email and electronic communications in an organized and consistent pattern reflecting the way in which the records are used and referenced. Records should be stored in a filing system or manner that is logical and searchable.

#### **E. Secondary (Duplicate) Copies of Records**

Duplicate copies of records (created or received) can be disposed of once they are no longer needed for the employee or official's work, so long as THA retains its primary copy of the record in accordance with the minimum retention period. Refer to Subsection D above for the designated responsibilities to retain the primary copy of the record.

Examples of secondary copies to which this section applies are:

- Data extracts and printouts from THA information systems;
- Cc's of emails, provided THA is retaining its primary copy of the email;
- Convenience/reference copies of records;
- Duplicate and near-duplicate images or photographs, provided the selected "best" image(s) documenting the occasion/object is retained.

This section excludes records which are THA's **only** copy of the record, even if it is also held by another agency.

#### **F. Policies and Procedures Regarding Texting and Instant Messaging**

The following policies and procedures are intended to help THA effectively manage business-related messages sent or received on THA and personal (non-THA) devices, including but not limited to mobile phones, tablets, and laptops:

1. In general, employees and officials may use texting/instant messaging for **transitory messages only**. Examples include informal notices of meetings, directions, scheduling information, and other routine messages that would not be kept in a file if they were paper communications.
2. Texting/instant messaging should not be used to send policy, contract, formal correspondence, or personnel-related data. Sensitive information should not be sent by text or instant message (e.g. social security numbers, credit card numbers, passwords, etc.).
3. Texts and instant messages with transitory retention value should be promptly deleted.

4. If a text or instant message needs to be retained pursuant to a retention schedule, employees and officials must immediately transfer the message to THA's network and/or devices.
5. Employees and officials must familiarize themselves with any personal device or account used to conduct THA business to know whether an auto-delete function is enabled and to manage their records accordingly (e.g., by disabling auto-delete or ensuring records are managed within the time frame they are available).

#### **6.5 RESPONSIBILITIES OF THA EMPLOYEES, OFFICIALS, AND VOLUNTEERS**

Each department will assist with implementing this policy and with filing, storing, managing, retaining, archiving, and disposing of its public records consistent with the policy, the Retention Schedules, and state and federal law.

All THA employees, officials, and volunteers shall review and follow the above policies and procedures. Failure to comply with this Records Retention Policy may result in disciplinary action up to and including termination from THA.

Before leaving employment or public office with THA, employees and officials must search for any public records in their personal possession, including but not limited to public records located on any personal (non-THA) cell phone or other device or account, and transmit copies of those public records to THA for retention and management. Any original, primary copies of THA public records in hard copy form should be physically transferred to THA.