

Citrus County Community Charitable Foundation, Inc.
Record Retention Management and Destruction

I. POLICY

It is the policy of the Board to maintain an adequate system for the management, retention, and destruction of records, to operate prudently, ethically, and in accordance with the law, government regulatory authorities and the view of the Citrus County Community Charitable Foundation's operation as a public trust subject to scrutiny by, and accountable to governmental authorities and members of the public.

II. PURPOSE

The purpose of this policy is to govern the records management practices of the Charitable Foundation so that all individuals with either direct or indirect responsibility may understand their respective responsibilities in prudently managing the Charitable Foundation's public records; to provide a clear statement of the Charitable Foundation's objectives; and to establish guidelines in compliance with the Charitable Foundation's enacting legislation (Florida Chapter 2014-254), Articles of Incorporation, and Bylaws, and other applicable law.

III. DEFINITIONS

"Public Records" is defined as all documents, papers, letters, maps, books, tapes, photographs, films, sound records, or other material regardless of physical form, characteristics made or received pursuant to law or ordinance or in connection with the transaction of official business of the Charitable Foundation.

IV. GOALS AND OBJECTIVES

A. Goals

In accordance with the Public Records Laws of the State of Florida, Section 119.0701, (2013), the Charitable Foundation must:

- a. Keep and maintain public records that ordinarily and necessarily would be required by the Charitable Foundation in order to perform its mission.
- b. Provide the public with access to public records at a cost that does not exceed the cost as provided by law.

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- c. Refrain from disclosure of public records that are exempt or confidential and exempt from public records, except as authorized by law.
- d. Meet all requirements for retaining public records and accept by transfer, at no cost, to the Charitable Foundation all public records in possession of the Charitable Foundation's contractors or vendors upon termination or expiration of a contract.
- e. All records stored electronically must be provided to the Charitable Foundation by its contractors or vendors in a format that is compatible with the information technology systems of the Charitable Foundation.

V. PROCEDURE

A. Retention

1. The Charitable Foundation maintains a centralized recordkeeping system managed and maintained by the Secretary of the Board of Directors. To this end, a centralized email address is established and maintained, and email communications to and from and related to the Charitable Foundation are sent to or from the central email address or copied to the email address for recordkeeping purposes.
2. Hard copy or paper records generated on behalf of the Charitable Foundation are provided to the Secretary for record retention purposes. The Secretary retains all official hardcopies or paper copies of non-digital public records. Not less than annually, any public records in possession of members of the Board of the Charitable Foundation are turned in to the Secretary of the Board for recordkeeping retention purposes.
3. The Secretary maintains a USB drive and the Charitable Foundation email address in which the Charitable Foundation's public records are maintained.

- B. Designation of Records Custodian. Public records requests for the Charitable Foundation are directed to the Secretary of the Board who serves as the Records Custodian for the Charitable Foundation, and will coordinate and respond to public records requests.

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C. Public Records Requests.

1. Copies of public records will be made available to the public in the format requested provided the Charitable Foundation stores or maintains the records in the requested format. Fees to be charged for providing access to public records must be in accordance with Section 119.07(4), Florida Statutes. If the nature or volume of records requested to be inspected or copied is such as to require extensive use of Charitable Foundation technology resources or extensive clerical or other assistance by Charitable Foundation contractors, employees, or both, a special service charge will be imposed. This charge must be reasonable and be based on the actual costs incurred for such extensive use of technology resources or the actual labor costs in providing such assistance, or both.
2. Requests for records may be made in writing, by electronic mail, telephone, letter, or in person. The requesters do not have to identify themselves or state the reason they desire the records.
3. Charitable Foundation directors, who receive a request to inspect or copy public records, must submit such requests to the Secretary of the Board by email to cccf2015@aol.com. The topic of the request should be set forth in the subject line of the request as well as the body of the message. Requests for records must be accepted and records made accessible for inspection or duplication during normal business hours. Inspection and examination must be allowed as soon as reasonably possible after receiving the records request. A request to inspect or copy the Charitable Foundation's public records cannot be denied because of a lack of specifics in the request. If a request to inspect or copy public records is vague, the requester can be asked to clarify the request.
4. The Public Records Act does not contain a specific time limit for compliance with public records requests. In accordance with Chapter 119, Florida Statutes, responsive records are provided in a reasonable time (a reasonable time allowed to retrieve the record, to review the record for exempt information, and redact those portions of the record which are exempt.) Many factors determine the "reasonable" period of time in which the requested information can be provided: the nature of the request, the time involved in collecting and generating the requested information, the scope and volume of the material involved, the general

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accessibility of the records, the personnel required to process the request and the information resources necessary to collect or generate the requested information. While every effort will be made to comply with public records requests promptly and in good faith, the Charitable Foundation currently has no paid staff, and relies solely on its volunteer board of directors to manage its operations; therefore, the Charitable Foundation will acknowledge receipt of public records requests within seventy-two (72) hours and will process such requests in the order in which they are received.

5. If it is determined that a record or part of a record is exempt from inspection and copying, and the request is then denied, the basis for the denial, including the statutory citation to the exemption, must be communicated to the requester. Additionally, if requested to do so, the denial of a request to inspect or copy the Charitable Foundation's public records must be made in writing, and must include both the reasons for conclusion that the record is exempt from inspection and copying and the statutory citation authorizing the denial. If a public record contains some information that is exempt from disclosure, only that portion of the record for which a valid exemption is asserted must be redacted, and the remainder of the record must be made available for inspection and copying.

D. Fees and Charges for Public Records Requests.

1. All past due fees for records compiled for a previous request for the Charitable Foundation's public records must be paid before complying with the requester's subsequent request(s).
2. A service charge for the extensive use of Charitable Foundation resources will be imposed if a request to inspect or copy public records takes more than 30 minutes to locate, review and/or redact exempt information, and copy the requested public records. Multiple requests by one individual may be considered as one request and extensive use charges may be applied after the first thirty (30) minutes of staff or resource time.
3. The following fees and charges are designed to ensure that the Charitable Foundation is consistent in its application of the law, which allows for the recovery of duplication costs and a special service charge for the extensive

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use of Charitable Foundation resources in complying with requests to inspect or copy the Charitable Foundation's public records.

- a. Duplication Costs – Duplication costs shall be applied uniformly throughout the Charitable Foundation in compliance with the following guidelines, unless otherwise designated by the Charitable Foundation.
 - i. Paper copies – Paper copies up to 8 ½ x 14 inches (letter and legal) must be provided at a cost of 15¢ per one-sided copy and 20¢ per double-sided copy. The cost of providing a certified copy of a record shall be \$1.00 per page.
 - ii. Actual Cost of Duplication – For all other copies – larger size paper, audio tape, video tape, CD, DVD, thumb drive, etc. – the cost to the requester will be no more than the actual cost of the materials used to duplicate the record.
 - iii. Requesters Making Their Own Copies – A requester making his/her own copies or providing copying materials cannot generally be charged for the cost of making the copies. However, a service charge may be imposed if supervision of those making their own copies requires an extensive use of the Charitable Foundation's resources.
 - iv. Requester provided media – The Charitable Foundation will not accept Compact Discs (CD), Digital Video Discs (DVD) or thumb drives due to concerns relating to contracting computer viruses.
 - v. Electronic Files – Electronic files sent via email to a requester will be provided with no copy charges.
- b. Extensive Use Charges – A special service charge for the extensive use of Charitable Foundation resources will be applied uniformly throughout the Charitable Foundation in compliance with the following guidelines. Costs are billed in

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quarter hour increments.

- i. Labor Costs – When more than thirty (30) minutes of clerical and/or labor time is spent in response to a request to inspect or copy the Charitable Foundation’s public records, a special service charge will be applied, which is based on minimum wage.
 - ii. Technology Resource Costs – Technology resources include use of personal computers, or other office machinery. A special service charge shall be collected if the time reasonably required to produce or display the record is over thirty (30) minutes.
- c. Shipping – U.S. postage or other shipping costs incurred in the delivery of records shall be included in the costs charged to the requester. Such charges will be waived if the requester provides a postage-paid envelope or other means of shipping.
- d. Fee Collection and Processing.
 - i. If the fees and charges for inspection or copying the Charitable Foundation’s public records total less than \$5.00, the fees and charges will be waived.
 - ii. When all allowable fees and charges applicable to a particular records request can be calculated in advance, and those fees and charges total more than \$25.00, the fees and charges must be collected in advance. If fees and charges are to be collected in advance, an invoice detailing all fees and charges must be provided to the requester.
 - iii. When actual allowable fees and cost(s) cannot be calculated in advance, a written estimate of all fees and cost(s) must be given to the requester and one-half of the estimated cost(s) must be collected in advance. Effort must be taken to ensure that the estimate(s) are accurate within 25% of the final

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cost(s). If the requester accepts the estimate and prepays half of the estimated cost(s), the Charitable Foundation will proceed with the request and furnish the records upon receipt of the balance due.

- iv. No sales tax is currently charged on public records fees.
- v. The Charitable Foundation accepts checks or money orders, made payable to the Citrus County Community Charitable Foundation, Inc. Payments may be mailed to the Charitable Foundation.

E. Destruction

1. The Charitable Foundation shall retain public records in accordance with the Florida Department of State, Division of Library and Information Services, Records Management General Records Schedules.
2. Once the record retention period, set forth in the General Records Schedules, has expired, the Charitable Foundation shall destroy records as appropriate. Prior to proceeding with destruction of records, the Secretary of the Board shall review with the President of the Board, those records scheduled for destruction and the General Records Schedule. All reports, records, and documents that are identified and approved for destruction that contain confidential or sensitive information shall be shredded. Video, audio or electronic records must be scrubbed or destroyed using current industry standards. When feasible, the Foundation will use recycling as the method to destroy records. The designated recycling company will guarantee that the records were destroyed and no longer recognizable as records and will sign a Certificate of Destruction to include the record destroyed, the method of destruction, the destruction date and agreeing to maintain the confidentiality of the record destroyed.
3. If an official audit, investigation or legal action is pending, or the Secretary of the Board has received notice of imminent audit, investigation or legal action, the Charitable Foundation may suspend its routine records destruction schedule in order to avoid destruction of records that may be relevant to the pending audit, investigation or legal action.

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