

# **Record Security, Retention, and Destruction Policy**

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The purpose of this policy is to outline the process for records retention, security, and destruction to ensure the most current version of any document is always available. This policy covers all records and documents, regardless of physical form, and contains guidelines for how long certain documents should be kept and how records should be destroyed.

This policy ensures compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate the operation of the International Board of Specialty Certification (“IBSC”) by promoting efficiency and freeing up valuable storage space.

Security measures are also addressed to ensure all examination related materials, i.e.: current and potential item bank, etc. are only accessed by those individuals authorized by the Board of Directors. The Chairman of the Board and the Chief Operating Officer (COO) are the only individuals authorized to have access to all examination related materials.

### **RETENTION SCHEDULE AND ADMINISTRATION**

All documents will be retained according to the following schedule set forth in Appendix A of this policy. Modifications to the Record Retention Schedule may be made from time to time to ensure compliance with local, state and federal laws including appropriate document and record categories for the IBSC. The COO is responsible for monitoring local, state and federal laws affecting record retention; annually reviewing the record retention and disposal program; monitoring compliance with this policy, and providing an annual report to the Board of Directors.

### **DOCUMENTS AND RECORDS**

The use of the term “documents” in this policy includes all hard copy and electronic materials. Documents received in hard copy may be converted to electronic format for storage. All confidential materials will be retained in compliance with the security policy. Any electronic files that fall into one of the document categories listed in Appendix A will be maintained for the appropriate amount of time as outlined in Appendix A. If a sufficient reason exists to keep an email message, the message should be moved to an “archive” computer file folder.

### **SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS**

No director, officer, employee, volunteer or agent of the IBSC shall destroy, dispose of, conceal, or alter any record or document while knowing that it is, or may be, relevant to an anticipated or ongoing investigation or legal proceeding conducted by or before a federal, state or local government agency, including tax and regulatory agencies, law enforcement agencies, and civil and criminal courts, or an anticipated or ongoing internal investigation, audit or review conducted by the IBSC.

During the occurrence of an anticipated or ongoing investigation or legal proceeding as set forth above, the COO shall suspend any further disposal of documents until such time as the IBSC Board of Directors, with the advice of counsel, determines otherwise. The COO shall take such steps as necessary to promptly inform all staff of any suspension in the further disposal of documents.

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#### **SECURITY**

IBSC will oversee security practices that ensure a secure, fair, and consistent examination administration process for all candidates.

Confidential candidate and certificant information will be maintained in a separate secured database that is accessible to the COO and one Registration Coordinator staff position. This Registration Coordinator will be required to complete training related to information security, as well as maintain a Conflict of Interest/Nondisclosure Agreement on file.

The Registration Coordinator will report directly to the COO. This position will be responsible for issuing examination vouchers, various correspondence, issuing certificates, ensuring candidate and certificant database is maintained, etc.

Issuance of certificates is limited to those certificants identified by PSI/AMP. That is, once the candidate successfully obtains certification, PSI/AMP uploads the data to their secured website. The data is then shared with a separate database where all certificant information is maintained. This information can only be accessed by the Chairman of the Board, COO, and the Registration Coordinator. No examination items can be accessed in either of these systems.

#### **EXAMINATION ADMINISTRATION**

The security of the IBSC certification examinations is of the utmost importance. Security policies, procedures, and practices will be periodically monitored to ensure that the exam is adequately protected.

All Pencil Paper examinations will be stored in a locked and secure, fire resistant, cabinet; with access limited to the Exam Security Officer as approved by the Chairman of the Board. Pencil Paper examination booklets will be numbered with a master tracking form maintained as to each booklet's location and use. This tracking form will be maintained with the examination booklets and audited on a regular basis by the Chairman of the Board to ensure compliance is maintained. Damaged or retired examination booklets shall be burned, pulverized, or shredded to ensure the information cannot be read or reconstructed.

#### **PHYSICAL SECURITY**

When shipping is required, examination materials will only be shipped using a traceable shipping method with delivery confirmation. A tracking device will be included in the shipping box. There will be no exceptions to this policy. When a written examination booklet is retired for any reason, it shall be burned, pulverized, or shredded to ensure the information cannot be read or reconstructed.

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### **ELECTRONIC SECURITY**

Routine backups will be performed for all electronic data. Confidential documents are not to be transmitted via email. Electronic files are to be shared via encrypted pathways and/or secured with a password before shared.

All confidential documents will be located on the secured Transporter computer drive, in a file that is accessible only to the Chairman of the Board and COO. These confidential materials will be encrypted and/or password protected as well.

Confidential materials stored on IBSC servers and hard drives will have access as approved by the Chairman of the Board. Personal computers/laptops will be password protected. Passwords will be communicated separately from data transmission.

Item Writers will only have access to those items they create. Once created, the item will be loaded to the secured Transporter system. The Item Writer will not have access to any item once it has been uploaded to the secured system.

Each new examination item created by the Item Writers will be maintained in the secured electronic file accessible to only the Chairman of the Board, COO, and the Chair of the Item Writing Committee. Once these items have been approved, they will be transferred to the next level of item security that can only be accessed by the Chairman of the Board and COO.

The Chairman of the Board and COO will then access these items to assist the Exam Construction Committee when a new form is required. Once a new form is created, the COO will be responsible for uploading this to the secured item bank utilized by our psychometric partners at PSI/AMP. Exam forms can only be accessed by the Chairman of the Board or COO. Neither the Chairman of the Board nor COO will be able to renew current certifications nor take any IBSC developed examination for a period of two years following their departure from the organization. This period of time ensures neither of these individuals would have access to any examination information being utilized at that future date.

### **VIOLATIONS**

Any suspected security violations will be reported promptly for investigation by the Chairman of the Board and the COO. All examination sites are required to report all exam administration irregularities to both PSI/AMP and the IBSC immediately. Known security violations will be discussed at a specially meeting of the Board of Directors, call specifically to address any security related matter.

Please address all questions and concerns regarding this policy to the Chairman and or the Chief Operating Officer.

## APPENDIX A – RECORD RETENTION SCHEDULE

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Record Type	Retention Period
<b>A. Accounting and Finance</b>	
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit related documents	7 years
Bank Statements and Canceled Checks	7 years
Expense Records	7 years
General Ledgers	Permanent
Electronic Payment Records	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment
<b>B. Corporate Records</b>	
Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
By-laws	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
IRS Application for Tax-exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Active Contracts (after expiration)	7 years
Licenses and Permits	Permanent
General correspondence	3 years
<b>C. Employee Documents</b>	
Benefit Plans	Permanent
Employee Files	Termination + 7 years
Employment applications, resumes and other forms of job inquiries, ads or notices for job opportunities	3 years
Forms I-9	3 years after hiring, or 1 year after separation
Employment Taxes	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	5 years
Unclaimed Wage Records	6 years
Retirement and Pension Records	Permanent

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#### D. Exam Records

Score Reports	Permanent
Examination results	Permanent
Candidate Registrations	Permanent
Program Documentation	Permanent
Context Analysis	Permanent
Test specifications	Permanent
Records of item writing activities	Permanent
Cut-score studies	Permanent
Technical reports	Permanent
Described Purposes and Procedures	Permanent
Defensible Information Sources	Permanent
Job Analysis Data	Permanent
Role Delineation Study Results	Permanent
Justified Conclusions	Permanent
Impartial Reporting	Permanent
Meta-Evaluation	Permanent
Requests for ADA accommodations	Permanent
Examination forms	6 months after retirement of exam form

#### E. Tax Records

Tax-Exemption Documents and Related Correspondence	Permanent
IRS 990 and 990T tax returns	Permanent
Tax Bills, Receipts, Statements	7 years
Tax Workpaper Packages - Originals	7 years
Sales/Use Tax Records	4 years

#### H. Program and Service Records

Research & Publications	Permanent (1 copy only)
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