490-WI HOUSING & ECONOMIC DEV AUTHORITY

Dept # *Department Name*

RDA #	*RDA Title*	*Retention*	*Disposition*	*PII*

00251000. **COMMERCIAL LOAN PROJECT FILES** **EVT+6** **DEST** **Y**

Records that document loans from application , review, approvals , commitments , due diligence, loan documents, and compliance monitoring from application through final loan repayment of the loan for those projects that receive a commercial loan from WHEDA, or received a loan in which WHEDA was a participant.

Records in this series may include:
- applications and application materials submitted by the applicants;
- credit reports and other financial information obtained or submitted by applicants;
- decisions papers and related materials;
- commitment letters;
- loan closing information, due diligence, surveys, project condition and environmental reports, plans and specifications , building permits and zoning approvals, organizational documents, legal opinions, and associated materials;
- loan documentation , including promissory notes, intercreditor agreements, UCC filings, mortgages, assignments, guarantees, escrow agreements, etc.
- project progress reports and ongoing financial information submitted by the recipient; and
- loan repayment documents, including payoff statements and release documents. Reason for new RDA: Supersede and consolidate multiple existing RDAs.

Pll and financial information of applicants and borrowers collected and retained (Access restricted - Wis. Stat. § 234.265).

EVT = Payoff; EVT + 6 yrs, Destroy Confidential

RETENTION: EVENT (Payoff: Full repayment of the loan/Other final disposition such as foreclosure) + 6 years and destroy confidential

00252000. **REJECTED COMMERCIAL LOAN APPLICATIONS** **EVT+3** **DEST** **Y**

Records related to an application to receive a commercial loan from WHEDA, or an application for WHEDA to participate in the making of a commercial loan, that is rejected, withdrawn, or otherwise never consummated.

Records in this series may include:
- pre-application materials, including correspondence ;
- applications and application materials submitted by the applicants;
- credit reports and other financial information obtained or submitted by applicants; and
- actions and documentations including letters and follow-up correspondence .

Reason for new RDA: Supersede and consolidate multiple existing RDAs.

Pll and financial information of applicants collected and retained (Access restricted - Wis. Stat. § 234.265).

EVT = File Closed; EVT + 3 yrs; File closed

RETENTION: EVENT (File closed: Rejection/Application abandonment/Commitment expiration) + 3 years and destroy confidential

00253000. **GUARANTEE PROJECT FILES** **EVT+6** **DEST** **Y**

Records that document commercial loan guarantees (including those made under Subchapter II of Chapter 234 of the Wisconsin Statutes) from application , review, approvals , commitment , due diligence, guarantee documents and agreements; underlying loan documents , and compliance monitoring from application through final disposition of the guarantee, including master guaranty agreements with lenders that govern all guarantees with such lender.

Records in this series may include:
- applications and application materials submitted by the applicant lender;
- information related to the underlying loan for which the lender is seeking a guarantee, such as due diligence, surveys, project condition and environmental reports, plans and specifications , building permits and zoning approvals , organizational documents, legal opinions, and associated materials;
- credit reports and other financial information related to the underlying borrower;
- decisions papers and related materials;
- guaranty commitment letters and agreements between WHEDA and lender;
- underlying loan documentation , including promissory notes, collateral documents, guaranties, pay-off and release documents;
- claims made under a guaranty and related records; and
- master guarantee agreements with lenders.

Reason for new RDA: Supersede and consolidate multiple existing RDAs.

Pll and financial information of applicants and borrowers collected and retained (Access restricted - Wis. Stat. § 234.265).

EVT = Termination; EVT + 6 yrs; Destroy Confidential

RETENTION: EVENT (Termination: Termination or payout of individual guarantee/Termination of Master Guarantee Agreement) + 6 years and destroy confidential

00254000. REJECTED GUARANTY APPLICATIONS EVT+3 DEST Y

Records related to an application to receive a commercial loan guarantee (including those made under Subchapter II of Chapter 234 of the Wisconsin Statutes) that is rejected, withdrawn, or otherwise never consummated .

Records in this series may include:
- pre-application materials , including correspondence ;
- applications and application materials submitted by the applicant lenders;
- information related to the underlying loan for which the lender is seeking a guarantee, such as due diligence , surveys , project condition and environmental reports, plans and specifications , building permits and zoning approvals, organizational documents, legal opinions , and associated materials ;;
- credit reports and other financial information related to the underlying borrower; and
- decisions papers and related materials.

Reason for new RDA: Supersede and consolidate multiple existing RDAs.

Pll and financial information of applicants and proposed borrowers collected and retained (Access restricted - Wis. Stat. § 234.265) .

EVT = File Closed; EVT + 3 yrs; Destroy Confidential

RETENTION: EVENT (File closed: Rejection/Application abandonment/Commitment expiration) + 3 years and destroy confidential

Dept # **/002/** Department Name **LEGAL**

RDA # RDA Title Retention Disposition PII

00108000. CONFIDENTIAL LEGAL MATTERS EVT+3 DEST Y

Office of General Counsel – Legal Files include, but are not limited to, litigation files, cases referred to outside counsel, court actions and decisions affecting the Authority, and legal assistance provided in support of various programs and activities of the Authority.

Confidential: Records in this record series contain attorney-client privileged information, attorney work product, and other confidential information. Attorney-Client Communications – Wis. Stat. § 905.03(2) and Attorney Work Product – Wis. Stat. § Wis. Stat. § 804.01(2)(c). In addition, some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential. See U.S.C. §§ 19.36(10)(a) and (13).

Final Closeout is the date the closeout report is filed by the General Counsel deeming the matter at issue resolved; in matters involving a case filed in state or federal court, such close out report shall not be filed until after all applicable appeal deadlines have passed.

RETENTION: EVENT (final closeout) + 3 years and destroy confidential

Dept # **/020/** Department Name **SINGLE FAMILY-ORIGINATION**

RDA # RDA Title Retention Disposition PII

00001000. WHEDA SERVICED HOME MORTGAGE FILE -REJECTED EVT+3 DEST Y

Records that document the application and review of the loan. Records in this series include, but are not limited to: applications, supporting documents, and general underwriting correspondence.

Some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential per Wis. Stat. § 234.265. Access is restricted per Wis. Stat. § 234.265.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61(7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

Dept # /020/ Department Name SINGLE FAMILY-ORIGINATION

RDA #	RDA Title	Retention	Disposition	PII

RETENTION: EVENT (date rejected) + 3 years and destroy confidential

Dept # /021/ Department Name CREDIT-MULTI FAMILY

RDA #	RDA Title	Retention	Disposition	PII
00012000.	LOW INCOME HOUSING TAX CREDIT FILES - REJECTED	EVT+6	DEST	Y

Records that document application, review, and Qualified Allocation Plan (QAP). Records in this series include, but are not limited to: applications and applications materials, general allocation correspondence.

Records in this series may contain confidential information. In addition, some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential. Access is restricted per Wis. Stat. § 234.265.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61 (7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed.

RETENTION: EVENT (Date Rejected) + 6 years and destroy confidential

RDA #	RDA Title	Retention	Disposition	PII
00242000.	LOW INCOME HOUSING TAX CREDIT FILES	EVT+33	DEST	Y

Records that document the review, approval, and allocation of housing tax credits, including, but not limited to: Qualified Allocation Plans, awarded applications and application materials, Land Use Restriction Agreements, related IRS forms (8609, 8610, 8823), compliance monitoring reports, form 200- status reports, form 100-owner certificates of continuing compliance, utility allowance documentation, management reviews, rent rolls, and general allocation and compliance monitoring correspondence.

Records in this series may contain confidential information. In addition, some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential. Access is restricted per Wis. Stat. § 234.265.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61 (7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

Event: If a project consists of a single building: the date upon which the building has been issued an IRS Form 8609.
If a project consists of multiple buildings: the date upon which every building in the project has been issued an IRS Form 8609.

RETENTION: EVENT + 33 years and destroy confidential

Dept # /060/ Department Name SINGLE FAMILY-SERVICING

RDA #	RDA Title	Retention	Disposition	PII
00003000.	PROPERTY TAX DEFERRAL & HILP PROGRAMS	EVT+3	DEST	Y

Records that document Property Tax Deferral Program and Home Improvement Loan Program (HILP) files. Records in this series include, but are not limited to: applications and application materials, review, and approvals, through servicing of the loan, appraisals, loan disclosures, credit reports, IRS forms, security instruments, bank statements, authorizations, loan correspondence, and servicing correspondence.

Records in this series may contain confidential information. In addition, some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential. Access is restricted per Wis. Stat. § 234.265.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat.§§ 16.61 (7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

RETENTION: EVENT (Mortgage Note Paid Off) + 3 years and destroy confidential

RDA #	RDA Title	Retention	Disposition	PII
00005000.	WHEDA SERVICED HOME MORTGAGE FILE	EVT+3	DEST	Y

Records that document WHEDA serviced Home Mortgages and Real-Estate Owned files. Records in this series include, but are not limited to: applications and application materials, review, and approvals, through servicing of the loan, appraisals, loan disclosures, credit reports, IRS forms, security instruments, bank statements, authorizations, loan correspondence, and servicing correspondence.

Records in this series may contain confidential information. In addition, some personally identifiable information in the records, such as social security numbers and financial account numbers may be confidential. Access is restricted per Wis. Stat. § 234.265.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61 (7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

RETENTION: EVENT (Mortgage Note Maturity Date) +3 years and destroy confidential

00091000. **SECTION 8 PROGRAMS** **EVT+6** **DEST** **Y**

Records that document WHEDA-financed projects, Section 8, Tenant-Based Assistance: Housing Choice Voucher Program (HCVP) and Section 8 Moderate Rehabilitation Programs with Housing Assistance Payments (HAP), under the United States Housing Act of 1937
(1937 Act), 42 U.S.C. § 1437(1) (Section 8). Records in this series include, but are not limited to: applications and application materials, application review, approvals, program documentation, compliance, financial information, executed HAP contracts, contract renewals, rent increases, budget and year-end statements, utility allowance analysis, management reviews, special claims, and opt out. Under 24 C.F.R. §982.158(e), 24 C.F.R. § 982.158(1), and 24 C.F.R. § 908.101 Section 8, Tenant-Based Assistance: HCVP and Section 8 Moderate
Rehabilitation projects, WHEDA is required to keep all program documentation during the term of each assisted tenancy, and for at least three years thereafter.

These records may contain the names of individuals and their families who are receiving assistance. Under 24 C.F.R. § 982.158(e), 24 C.F.R. § 982.158(1), and 24 C.F.R. § 908.101, records pertaining to such individuals must be kept secure and confidential.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61(7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

Event: WHEDA Financed Section 8 File Closed (Full repayment of the loan, file rejected, program completed, or agent terminated)

RETENTION: EVENT + 6 years and destroy confidential

00238000. **PERFORMANCE BASED CONTRACT ADMINISTRATION (PBCA) FILES** **EVT+6** **DEST** **Y**

Records that document Performance Based Contract Administration (PBCA) Section-8 projects with Housing Assistance Payments (HAP) contracts from application, review, approvals, program documentation, and compliance under the United States Housing Act of 1937 (1937 Act), 42 U.S.C. § 14371 (Section 8). Records in this series include, but are not limited to: Applications and application materials, financial
information, executed HAP contracts, contract Renewals, rent Increases, budgets, utility allowance analysis, management reviews, special claims, and opt outs. Under 24 CFR 982158(e), (f), 24 CFR 908.101 records pertaining to such individual must be kept secure and
confidential.

These records may contain the names of individuals and their families who are receiving assistance. Under 24 C.F.R. § 982.158(e), 24 C.F.R. § 982.158(1), and 24 C.F.R. § 908.101, records pertaining to such individuals must be kept secure and confidential.

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat.§§ 16.61 (7) and 137.20 for authenticity, accuracy, and accessibility, the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed.

EVT = Housing and Urban Development (HUD) Audit Completion.

RETENTION: EVENT + 6 years and destroy confidential

Dept #	/063/	Department Name	ASSET MANAGEMENT		
RDA #	RDA Title		Retention	Disposition	PII

Dept #	/080/	Department Name	HUMAN RESOURCES AND ADMINISTRATION		
RDA #	RDA Title		Retention	Disposition	PII

00162000. **LEGISLATIVE DOCUMENTS** **EVT+6** **TRANS OTHER** **Y**

Files contain background materials and letters relating to proposed and enacted legislation affecting the department both at the state and federal level. Records in this series may include but are not limited to:

- Bill drafts and introduced bills and analyses
- Fiscal estimates
- Amendments
- Attorney notes andmemoranda
- Policy and position recommendations
- Agency position on bills and amendments
- Related correspondence

The official record will be maintained electronically for the full retention period. To comply with Wis. Stat. §§ 16.61(7) and 137.20 for authenticity, accuracy, and accessibility the original input documents will be imaged or reformatted and subject to review, to ensure the images of these applications are electronically stored and the quality of these images is acceptable. Upon verification of the quality and retention of the electronic images, the input record will be destroyed confidentially.

RETENTION: EVENT (last date of biennial session) + 6 years and transfer to WHS.