

RECORD RETENTION POLICY

I. Purpose

It is the purpose of this policy to establish a consistent record retention policy for _____ (the "Organization").

II. Policy

The Organization shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy include paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities.

It is the policy of the Organization to preserve official records as provided in the Record Retention Schedule of this policy. Records that have exceeded the retention period provided in the Schedule are authorized to be discarded consistent with the policy provisions that follow. The Schedule's retention periods have been established consistent with Federal and legal regulations.

However, if an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction. Thus, records pertaining to programs under litigation or audit are to be retained until such issues are resolved.

III. Procedure

A. General Records

The Chief Executive Officer shall appoint and maintain a Records Deputy who is to work on all matters of document retention. Such Record Deputy will audit and inventory, as needed, section records and take timely steps to insure section compliance with the following record retention schedule.

Record Retention Schedule

Accounting and Audit	
Accounts payable/receivable ledger reports	7 years
Audited yearly reports	Permanently
Bank statements and reconciliation	3 years
Budget analysis and reports for sections	3 years
Cancelled checks	7 years
Cost rate proposals/work papers	Permanently
Depreciation schedules	Permanently

Financial transfers documentation (<i>see definitions</i>)	3 years
Fixed asset schedules	7 years
Internal audit reports	3 years
Monthly closing ledgers	7 years
Monthly financial statements	7 years
Monthly general ledger documents	Review after 7 years
Monthly travel reports	3 years
Supporting documents for grant monitoring/auditing	Closeout of grant + 3 years
Tax records/supporting documentation for tax purposes	Permanently
Vendor invoices	7 years

Administration and Organization Resources

Applicant resumes	3 years
Audit responses	Review after 3 years
Benefit and compensation studies	7 years
Board minutes and books, bylaws, charter, founding documents	Permanently
Budget & Audit reports	Review after 7 years
EEO Charges/Investigation	10 years
Payroll files and timesheets	7 years
Personnel and Consultant Files (<i>see definitions</i>)	Service of employee + 7 years
Operational administration documentation (<i>see definitions</i>)	Permanently
Retirement and pension records	Permanently
Risk reports	7 years
Contracts, notes and leases (expired)	7 years
Contracts (in effect)	Permanently
Insurance policies (expired)	3 years
Insurance records, current accident reports, claims, current policies	Permanently
Inventories of products, materials and supplies	7 years
Trademark and copyright registrations	Permanently

Correspondence

General business correspondence	2 years
Legal and tax correspondence	Permanently
Official Chief Executive Officer's Correspondence (<i>see definitions</i>)	Permanently
Email correspondence	See III.B

Grants Records

General grants records and supporting materials (<i>see definitions</i>)	3 years after filing final financial report
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Personnel workload analysis	3 years
Trip reports	3 years

Policy and Procedural

Employee guidelines manuals	Review after 7 years
Employee procedures materials	Review after 7 years
Organization training manuals	Review after 7 years

Publications and Events

Organization publications	Permanently
Supporting documents for publications (<i>see definitions</i>)	Review after 3 years
Official event-related documents (<i>see definitions</i>)	Permanently
Preparation documents for events (<i>see definitions</i>)	Review after 3 years

Retention Schedule – DEFINITIONS

Financial transfers documentation – **Accounting and Audit**; Records such as wire confirmations, wire transfers, and cash receipts which document official financial transfers

General grants records and supporting materials – **Grants Records**; Records which document the grant-making process (as either grant maker or grantee), such as: Grant proposals and budgets, accounting questionnaires and payment forms, grant applications to funding agencies, private foundations and other donors, email correspondence, monthly grants payable reports, financial reports, narrative reports, evaluation reports, preliminary grant files, grant closeout forms, independent assessments and evaluations, grant review tracking sheets

Official event-related documents – **Publications and Events**; Applies *only* to official documents relating to an event, such as the invitation, transcript, program, other handout

Official Chief Executive Officer’s correspondence – **Correspondence**; only applies to correspondence stored in the Chief Executive Officer’s Chron File

Operational administrative documentation – **Administration and Organization Resources**; Any record which is necessary to ensure the normal functioning of the Organization, such as: Organization tax exemption papers, insurance policies, office leases and management succession plans

Personnel and consultant files – **Administration and Organization Resources**; Records such as benefit forms, W2 tax forms, I-9 forms, that provide basic documentation of Organization personnel and consultants

Supporting/preparation documents for events – **Publications and Events**; Any documents created in preparation for an event, or for administrative support of an event, such as: RSVP lists, draft programs, invoices

Supporting documents for grant monitoring/auditing – **Accounting and Audit**; Any records which support or document audits of Organization grants, such as: accounting questionnaires, risk assessments, core on-site reviews, audit logs

Supporting documents for publications – **Publications and Events**; any documents created while preparing a finalized Organization publication

B. E-mail Records

For the purposes of this retention policy, “Email” (or “E-mail”, “e-mail”, “email”) is defined as “Electronic mail that is:

- destined for a specific user or set of users internal or external to the Organization
- from a specific, identifiable email address (real or virtual)
- received by our internal electronic mail system

The following items are expressly **not** considered electronic mail:

- items from an unidentified source (i.e. no entry in the “From” field)
- notifications from systems indicating system status, backup success/failure, hard drive space warnings, or any similar types of notification
- notifications from the SPAM (or associated) filter (although items released as a result of authorization from the SPAM filter **are** considered electronic mail)
- any items not allowed through by the SPAM (or associated) filter (except as noted above)
- a notification from an automated process or system
- trapped, quarantined or otherwise impeded by the external filtering system or internal anti-virus/anti-SPAM systems”

All email received and stored by the internal mail system, regardless of whether it is sent by an external source or an internal source will be maintained by the system for a period of **6 months (approximately 180 days) from the date of receipt by the mail system**. Even if a user deletes an email, the system will maintain an accessible copy for a period of **6 months**. For the purposes of consistency and enforceability, all data will reside solely on the email server.

The various additional functions provided by the current electronic mail system, to include, but not limited to, task lists entries, journal entries and notes (or e-notes) are also subject to the same **6 month** time frame.

Meetings will be automatically deleted from public calendars and individual calendars **3 months (90 days)** after the meeting date.

Items placed within folders other than the Sent Items folder, either by human intervention or by a rule which is initiated by the user will be retained until the user’s electronic mail account is deleted. Individual contact information will be kept as long as the account is active.

The deleted items folder will be set to “empty” upon closing of the mail application on the user’s computer.

A user’s electronic mail account and associated contacts and personal folders will be automatically deleted 30 days after the user is no longer employed or contracted by the Organization.

C. Legal Holds

From time to time, the Chief Executive Officer may issue a notice, known as a “Legal Hold,” suspending the destruction of records due to pending, threatened or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. No records specified in any Legal Hold may be destroyed, even if the scheduled destruction date has passed, until the hold is withdrawn in writing by the Chief Executive Officer.

IV. Record Deputy - Appointment and Reporting

The Chief Executive Officer shall appoint a Records Deputy who is to work on all matters of document retention. The name of the Record Deputy is to be communicated to Organization staff. Such appointees serve at the pleasure of the Chief Executive Officer and shall be changed from time to time as operational needs warrant.

V. Responsibility

It is the responsibility of each Department of the Organization to adhere to the Record Retention Schedule. The Chief Executive Officer is responsible for resolving questions of interpretation about this policy and to develop and present organization-wide training to facilitate sound administration of this policy. Matters requiring further resolution are to be referred to legal counsel.

Effective Date

9/24/2009