

Members of: American Institute of Certified Public Accountants Virginia Society of Certified Public Accountants

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Document Retention and Destruction Policy

Purpose

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding. This policy provides for the systematic review, retention and destruction of documents received or created by the Organization in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form (including electronic documents), contains guidelines for how long certain documents should be kept and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate the Organization's operations by promoting efficiency and freeing up valuable storage space.

Document Retention

The Organization follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

Corporate Records

Annual Reports to Secretary of State/Attorney General Articles of Incorporation Board Meeting and Board Committee Minutes Board Policies/Resolutions By-laws Construction Documents Fixed Asset Records IRS Application for Tax-Exempt Status (Form 1023) IRS Determination Letter State Sales Tax Exemption Letter Contracts (after expiration)	Permanent
Contracts (after expiration) Correspondence (general)	7 years
Correspondence (general)	3 years

Accounting and Corporate Tax Records

Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
General Ledgers	Permanent
IRS 990 Tax Returns	Permanent
Business Expense Records	7 years
IRS 1099s	7 years
Journal Entries	7 years
Invoices	7 years
Sales Records (box office, concessions, gift shop)	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

Bank Records

Check RegistersPermanentBank Deposit Slips7 yearsBank Statements and Reconciliation7 yearsElectronic Fund Transfer Documents7 years

Payroll and Employment Tax Records

Payroll Registers
State Unemployment Tax Records
Earnings Records
Garnishment Records
Payroll Tax returns
7 years
7 years
7 years
7 years
7 years
7 years

Employee Records

Employment and Termination Agreements Permanent Retirement and Pension Plan Documents Permanent

Records Relating to Promotion, Demotion or Discharge 7 years after termination

Accident Reports and Worker's Compensation Records 5 years
Salary Schedules 5 years
Employment Applications 3 years

I-9 Forms 3 years after termination

Time Cards 2 years
Donor Records and Acknowledgement Letters 7 years

Grant Applications and Contracts 5 years after completion

Legal, Insurance and Safety Records

Appraisals Permanent
Copyright Registrations Permanent
Environmental Studies Permanent
Insurance Policies Permanent
Real Estate Documents Permanent
Stock and Bond Records Permanent
Trademark Registrations Permanent

Leases 6 years after expiration

OSHA Documents 5 years

General Contracts 3 years after termination

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

Emergency Planning

The Organization's records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the Organization operating in an emergency will be duplicated or backed up at least every week and maintained off site.

Document Destruction

The Organization's Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Compliance

Failure on the part of employees or contract staff to follow this policy can result in possible civil and criminal sanctions against the Organization and its employees or contract staff and possible disciplinary action against responsible individuals. The Treasurer will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.