

United Way of Portage County, Inc. Record Retention and Destruction Policy

The purpose of this policy is to establish requirements for both the **retention** of organizational records and for an intentional, periodic process for the **destruction** of records. This policy is in compliance with the provisions of the Sarbanes-Oxley Act.

Table A, which is attached and is part of this policy, provides guidance on the retention period for a number of record types.

Policy:

It is the organization's policy to maintain complete, accurate, and high quality records, and to effectively manage those records in accordance with all applicable laws and regulations and with this policy.

All organization employees and agents are responsible for ensuring that all records are created, used, maintained, preserved, and destroyed in accordance with this Record Retention and Destruction Policy.

Records containing confidential and proprietary information will be securely maintained, controlled, and protected to prevent unauthorized access.

All records generated and received by the organization are the property of the organization. No employee, by virtue of their position, has any personal or property right to such records even though they may have developed or compiled them. The unauthorized destruction, removal, or use of such records is prohibited.

No one may falsify or inappropriately alter information in any record or document.

Records that have satisfied their required period of retention will be destroyed in an appropriate manner. The destruction of any of the organization's official documents, reports or records, as noted in the table , must be authorized by the Executive Director or his/her designee.

The Executive Director will be responsible for the administration of the Policy. Any changes or revisions to the policy or retention schedule will approved by the Finance Committee and the Board of Directors.

Information pertaining to unauthorized destruction, removal, or use of organization records, or regarding falsifying or inappropriately altering information in a record or document should be reported directly to the Executive Director or in accordance with the Whistleblower Policy.

General Guidelines:

If any litigation, claim, or audit is started before the expiration of the stated retention period, the records relating to that subject shall be retained until all litigation claims, or audit findings involving those records have been resolved and final action taken, or until the stated retention period is expired, whichever is longest.

Unless otherwise noted, all retention periods shall begin at the end of the year when the tax return (Form 990 or otherwise) is filed for the year to which the document applies. If the statute of limitations concerning a tax year is extended, retention should be extended accordingly.

The retention period for some records, such as fixed asset purchases, mortgages, and routine contracts begins with the disposal of the asset or the termination or expiration of the agreement or contract.

When appropriate, inactive paper records scheduled for destruction in future periods will be stored in containers (such as banker's boxes), with contents clearly labeled, and with the destruction date clearly indicated on the box.

While records should be destroyed when the retention period has passed, the historical or archival value of some records should be considered in light of future research or public relations purposes.

Electronic files are considered the same as a paper file. If a document only exists electronically, it should be retained for the same retention period.

- In case of litigation, the electronic file has the same status as a paper file. Voice mail and email can be considered subject to mandatory retention in cases of litigation. While litigation issues are highly unlikely at United Way, if a case should arise the assistance of technical staff should be sought to preserve the appropriate electronic messages.
- Records on individual computers, files residing on file servers, and CD's or other electronic media should be reviewed annually for compliance with the retention and destruction policy.
- The organization backs up server files in such a manner that backup records are available for 30 days. Backups are done for data security in case of system failure and are not a replacement for record retention.
- Records may also be retained by third parties in web-based applications, such as online check imaging provided by our bank.
- Electronic media containing electronic files should be clearly identified and where appropriate, aggregated in individual network folders by destruction date.

Table A
Document Retention Periods

Type of Record	Retention Period (Years)
Accounting	
Agency payment reports (OBI and grants)	3
Audit reports	Permanent
Bank statements & reconciliations,	7
Budgets	3
Cancelled checks	7
Contracts (purchases and campaign)	7 yrs post term
Deposit slips	3
Depreciation schedules	3 yrs post disposal
Designation payment reports and worksheets	3
Endowment contribution support documents	Permanent
Expense reports	7
Federal grant supporting documentation (unless superseded)	3
Financial statements (interim forecasts)	3
Financial statements (system generated year-end)	Permanent
Fixed asset purchase documentation	3 yrs post disposal
General ledgers and journals	Permanent
Miscellaneous income returns (Form 1099)	Permanent
Payroll reports, earnings records	7
Payroll tax returns (Form 941) and employee earnings (Form W-2)	Permanent
Payroll time sheets	3
Petty cash vouchers	3
Pledge cards and similar pledge documentation	3
Pledge payment records and other cash receipts	3
Restricted contribution documentation (non-campaign)	3 yrs post lapse
Subsidiary ledgers (accounts payable and pledges receivable)	7
Subsidiary ledgers (agency, grant, designation payments)	Permanent
Unrestricted contribution documentation (non-campaign)	7
Vendor payments (purchase orders, invoices, bills of lading, etc)	3
Corporate	
Bylaws, charters, minute books	Permanent
Checks (taxes, property, fulfillment of important contracts)	Permanent
Contracts and agreements (non-routine)	Permanent
Copyright and trademark registrations	Permanent
Correspondence (general)	2
Correspondence (legal, tax, license)	Permanent
Deeds and easements	Permanent
IRS 501c3 approval letter	Permanent
Labor contracts	Permanent

Leases	7 yrs post expired
Mortgages and notes	15 yrs post expired
Type of Record	Retention Peiod (Years)
Corporate (continued)	
Planned giving agreements (annuity gifts, life insurance, etc)	Permanent
Solicitation permits and applications (state and local)	Permanent
Tax exemption requests and documentation (federal, state, local)	Permanent
Tax returns (Form 5500, PBGC, etc) including workpapers	Permanent
Tax returns (Form 990, etc) including workpapers	Permanent
Human Resources	
Contracts (employment)	7 yrs post term
Disability benefit records	Permanent
Employee payroll records & withholding tax statements	7
Employment applications	1
Exposure to workplace hazards records	30 yrs post term
OSHA reports and records	5
Pension records (plan documents, agreements, etc)	Permanent
Pension reports (SPDs, annual reports)	7
Personnel files (terminated)	10
Insurance	
Accident reports	7
Fire inspection reports	7
Group disability records	7
Insurance claims (settled)	7 yrs post final
Policies (expired)	7 yrs post expired
Safety records	7

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