

Boys and Girls Clubs of Elko

Records Retention & Destruction Policy

BGCE recognizes the need to maintain complete, accurate, and high quality records and to regularly dispose of unnecessary and outdated documents and files in order to maintain organization efficiencies by limiting the cost of record storage and the volume of documents chronicled by staff.

Prudent business operation requires that disposal of documents be undertaken with caution, lest a record be destroyed that is needed later. In addition, the Sarbanes-Oxley Act makes it a crime to alter, cover-up, falsify, or destroy any record to prevent its use in an official proceeding. The Act turns intentional document destruction into a process that must be monitored, justified, and carefully administered.

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.

This policy including the attached table provides clear and mandatory requirements for both the **retention** of organizational records and for intentional, periodic process for the **destruction** of records.

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.

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 dated clearly indicated on the box. Employees and agents of the BGCE are responsible for maintaining a list of files scheduled to be destroyed, by shredding, based on their original destroy date. Prior to destruction, the assigned/designated BGCE employee(s) or agent(s) will review the list in accordance with this policy and files approved for shredding or, if needed, the destroy date is revised and the files retained.

Records that have satisfied their required period of retention will be destroyed in an appropriate manner.

The Chief Operating Officer will be responsible for the administration of the Policy. Any changes or revisions to the policy or retention schedule will be approved by the Finance Committee.

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 CEO.

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. Managers may request an exception to the policy by presenting an assessment of the particular situation to the CEO(or designee).

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. Electronic media containing electronic files should be clearly identified and where appropriate, aggregated individual network folders by destruction date.

DEFINITION:

Record: A record is recorded information, regardless of medium or characteristic, which can be retrieved at any time. It includes all original documents, papers, letters, cards, books, photographs, sound or video recordings, magnetic tape, electronic media, and other information containing media that are generated and/or received in connection with transacting the organization's business. If not stipulated otherwise, these are the records to which the retention schedule applies.

Non-Record: Non-records material includes duplicate copies or correspondence, duplicate copies of records used for short-term reference purposes, blank forms, stocks of publications, magazines, newspapers, public telephone directories, and transitory messages used primarily for the informal communication of information. Transitory messages do not set policy, establish guidelines or procedures certify a transaction, or become a receipt. Transitory messages may include, but are not limited to; e-mail messages with short-lived or no administrative value, voice mail, and telephone messages.

Notes of unofficial meetings, telephone conversations or other personal notes, when generated should be routinely discarded when they are no longer useful. For example, when informal notes are transferred to a more formal record, the notes are no longer useful and should be discarded.

Preliminary working papers and superseded drafts, particularly after subsequent versions are finalized, should be discarded.

Non-records are maintained for as long as administratively needed, and the retention schedules do not apply. Non-records may be discarded when the business use has terminated.

E-Mail Communications: E-mail communications, messages and documents transmitted by e-mail are similar to paper documents. They may be considered business records and are subject to this policy. To determine whether an e-mail message must be retained and for how long, think of it as if it were a paper memo or document. If a memo would be retained due to its content, then an e-mail message with the same content should be retained for the same length of time.

The originator of the e-mail message (or the recipient if the message is from outside the organization) is the person responsible for retaining the message. E-mail messages may be retained in electronic form in the mailbox, or be printed and filed along with other documents related to the topic. Users may delete e-mail messages that they are not required by this policy to retain (such as non-record and transitory messages) and messages that are being retained in printed form.

LITIGATION:

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.

In case of litigation, the electronic file has the same status as a paper file. Voice mail and e-mail can be considered subject to mandatory retention in cases of litigation. While litigation issues are highly unlikely at the BGCE, if a case should arise the assistance of technical staff should be sought to preserve the appropriate electronic messages.

The CEO will be responsible for notifying affected employees of changes to retention requirements in cases where litigation or pending claims extends the retention period, and will work collectively to identify records that may apply to the issue in question.

DOCUMENT RETENTION PERIODS:

Unless otherwise noted, all retention periods listed in the following table shall begin with filing the tax return to which the document applies. If the statute of limitations concerning a tax year is extended, retention should be extended accordingly.

Note that the retention period for some records begins with the disposal of the asset or the termination or expiration of the agreement or contract.

Type of Record	Retention Period (Years)
Accounting	
Audit reports	Permanent
Bank statements & reconciliations	7
Budgets	3
Cancelled checks	7
Grants Reports and Grant documentation	6
Contracts (purchases and campaign)	7 yrs post termination
Deposit slips	7
Depreciation schedules	3 yrs post disposal

Designation payment reports and worksheets	3
Endowment contribution support documents	Permanent
Expense reports	7
Financial statements (interim forecasts)	7
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, earning records	7
Payroll tax returns (Form 941) and employee earnings (Form W-2)	Permanent
Payroll time sheets	7
Petty cash vouchers	7
Pledge cards and similar pledge documentation	7
Pledge payment records and other cash receipts	7
Restricted contribution documentation (non-campaign)	3 yrs post lapse
Subsidiary ledgers (accounts payable and pledges receivable)	7
Unrestricted contribution documentation (non-campaign)	7
Vendor payments (purchase orders, invoices, bills of lading, etc.)	7

Type of Record	Retention Period (Years)
Corporate	
Bylaws, charters, minute books	Permanent
Checks (taxes, property, fulfillment of important contracts)	

	Permanent
Contracts and agreements (non-routine)	Permanent
Copyrights and trademark registrations	Permanent
Correspondence (general)	2
Correspondence (legal, tax, license)	Permanent
Deeds and easements	Permanent
IRS 501c3 approval letter	Permanent
Leases	7 yrs post expired
Notes	15 yrs post expired
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 work papers	Permanent
Tax returns (Form 990, etc) including work papers	Permanent
Human Resources	
Contracts (employment)	7 yrs post term
Disability benefit records	Permanent
Employee payroll records & withholding tax statements	7
Employment applications	2
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

I-9	Post term: later of 3 yrs after hire/1 yr after term
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