

DOCUMENT RETENTION POLICY AND PROCEDURE

I. Document Retention/Destruction Policy

The Document Retention and Destruction Policy identifies the responsibilities of staff, volunteers, members of the board of directors, and contractors for maintaining and documenting the storage and destruction of **The James Blake Foundation** documents and records. This document retention policy and procedure will enhance compliance with the Sarbanes-Oxley Act and promote the proper treatment of records of **The James Blake Foundation**.

Document retention policies apply equally to documents saved in the cloud, on a server, electronic files or in a filing cabinet. Documents should not be kept if they are no longer needed for the operation of **The James Blake Foundation** or required by law. The types of documents identified in the Schedule of Materials chart below should be retained for the minimum recommended period of time.

II. Schedule of Materials/Time Period for Retention

The following document retention procedure is recommended for **The James Blake Foundation**. Some records may not have been identified in the chart below. Documents that are similar should be retained for the period of time listed below.

Corporate records	
<i>Document</i>	<i>Retention period</i>
Annual reports to the secretary of state or attorney general	Permanent
Articles of incorporation	Permanent
Board meeting minutes	Permanent
Board policies and resolutions	Permanent
Bylaws	Permanent
Construction documents	Permanent
Fixed asset records	Permanent
IRS application for tax-exempt status (Form 1023)	Permanent
IRS determination letter	Permanent
State sales tax exemption letter	Permanent
Contracts	7 years after termination
General correspondence	3 years
Committee Minutes	3 years
Accounting and corporate tax records	
Annual audits and year-end financial statements	Permanent

Depreciation schedules	Permanent
IRS Form 990 tax returns	Permanent
General ledgers	7 years
Business expense records	7 years
IRS Form 1099	7 years
Journal entries	7 years
Invoices	7 years
Sales records (books)	5 years
Petty cash vouchers	3 years
Cash receipts	3 years
Credit card receipts	3 years
Credit card records (documents showing customer credit card number) ¹	2 years
Bank records	
Check registers	7 years
Bank deposit slips	7 years
Bank statement and reconciliation	7 years
Electronic fund transfer documents	7 years
Payroll and employment tax records	
State unemployment tax records	Permanent
Payroll records	Permanent
Garnishment records	7 years
Payroll tax returns	7 years
W-2 statements	7 years
Employment tax records	At least 4 years after filing the year's 4th quarter taxes (or longer, if required by state law)
Human resource records	
Customer credit card information retention and destruction	Permanent
Employment and termination agreements	Permanent
Retirement records	Permanent
Records relating to promotion, demotion or discharge	7 years after termination
Publications, Donations, Dues	Permanent
Employee Handbooks	One copy of each version - Permanent
Accident reports and workers' compensation records	5 years
Background checks, drug test results, driving records and employment verifications	5 years

¹ If it is determined that information on a document, which contains credit card information, is necessary for retention beyond 2 years, then the credit card number will be cut out of the document.

Resumes, employment applications and related materials (including interview notes) for employees	4 years after termination
Resumes, employment applications and related materials (including interview notes) for applicants not hired	3 years
Timesheets, compensation history and job history	4 years after termination
Performance appraisal and disciplinary action records	4 years after termination
I-9 forms	3 years after hire date or 1 year after employment ends (whichever is later)
Donor and grant records	
Donor records and acknowledgment letters	7 years
Grant applications and contracts	7 years after expiration
Legal, insurance and safety records	
Appraisals	Permanent
Copyright registrations	Permanent
Court Orders	Permanent
Environmental studies	Permanent
Insurance policies	Permanent
Real estate documents	Permanent
Stock and bond records	Permanent
Trademark registrations	Permanent
Leases	7 years after expiration or termination
OSHA documents	5 years
General contracts, including any proposals that resulted in the contract and all supporting documentation	3 years after expiration or termination

III. Record Management Process

Implementing a Document Retention Policy can be a daunting task for an organization. The steps outlined below can help your organization more easily execute this plan.

A. Step 1: How to Start

The first step to implementing a Document Retention Policy is to identify where all **[name of organization]** documents are currently stored:

- Storage boxes
- File cabinets
- Computers and laptops
- Hard drives (external)
- Online Storage (ex. Dropbox, Google Drive, iCloud)

B. Step 2: Categorization

Review the documents and assign each to the appropriate category itemized in the Schedule of Materials chart on page 1. Assigning documents to the appropriate category should be done regardless of medium (electronic or paper). Retain records that must be kept for legal or business reasons. These records should be stored for the recommended period of time. Records that fall outside of the categories should follow the process for destruction on non-essential records.

C. Step 3: Records Storage

There are two options for which to properly store records. Both options are outlined below.

Paper Files Storage

There are off-site record storage facilities like Iron Mountain who professionally store documents in a climate controlled, safe environment. They also shred records upon request. These facilities are typically for organizations that have a volume of boxes that will need to be stored or it is cost prohibitive.

But, there two alternatives to an offsite facility as follows:

1. Maintain files in a waterproof/fireproof file cabinet that can be locked. The file cabinet should be stored with a current officer of the organization. Two keys should be made, and a second officer or board member should have access.
2. A bank safe deposit box can be retained at the same location where **The James Blake Foundation** currently has its financial accounts. In this case, most banks require two signatures, Treasurer and President. The same officers would have access to the safe deposit box.

Scanning Paper Documents to Store as Electronic Files

Paper files can be scanned and maintained according to the Electronic Files Storage procedure outlined below. It is recommended that original documents are retained 60 to 120 days in case they need to be re-scanned and/or items were missed.

However, it is recommended that **The James Blake Foundation** preserve the following documents in its original form:

- Employment contracts and contracts for personal services
- Contracts or agreements related to major transactions
- Opinions of counsel
- Correspondence having a clear effect on the organization's legal rights or obligations
- Promissory notes
- Title deeds and lease
- Court orders affecting title
- Probate proceedings

Files Storage

Electronic files include, but are not limited to email, documents saved on hard drives and online storage platforms. The types of documents that should be retained as part of this Retention Policy are itemized in the Schedule of Materials chart on page 1.

Electronic records should be stored in a separate computer file system or repository that is:

- Backed up on a regular schedule (once a week)
- Compliant with all privacy and security requirements
- Allows for shared access
- Organized in a way that records can be identified and purged appropriately
- Able to migrate content to a new system upon replacement
- Maintained through regular software updates

Electronic backups should not be placed on personal or office computers. The files should be maintained on either an external hard drive or flash drive, and the backed-up files should reside with a designated officer of the organization.

If the organization decides to use an online service such as Dropbox, Google Drive, or iCloud, be sure the service includes a regular back up of **The James Blake Foundation** online files. Two officers should have access to the online back up file.

When the retention period for any particular document has ended it is important the information is carefully destroyed so that any confidential information can't be read or reconstructed.

1. Electronic Mail: Not all email needs to be retained, depending on the subject matter

- All e-mail—from internal or external sources—is to be deleted after 12 months.
- Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.

- {Insert Name of Organization} will archive e-mail for six months after the staff has deleted it, after which time the e-mail will be permanently deleted.
 - All {Insert Name of Organization} business-related email should be downloaded to a service center or user directory on the server.
 - Staff will not store or transfer The James Blake Foundation -related e-mail on non-work-related computers except as necessary or appropriate for The James Blake Foundation purposes.
 - Staff will take care not to send confidential/proprietary The James Blake Foundation information to outside sources.
 - Any e-mail staff deems vital to the performance of their job should be copied to the staff's drive folder and printed and stored in the employee's workspace.
2. Electronic Documents: including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.
- PDF documents – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy. PDF files the employee deems vital to the performance of his or her job should be printed and stored in the employee's workspace.
 - Text/formatted files - Staff will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated. After five years, all text files will be deleted from the network and the staff's desktop/laptop. Text/formatted files the staff deems vital to the performance of their job should be printed and stored in the staff's workspace.
3. Web Page Files: Internet Cookies
- All workstations: Internet browser should be scheduled to delete Internet cookies once per month.

The James Blake Foundation does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy.

In certain cases, a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

D. Step 4: Records Destruction

It is recommended that the shredding/destruction project is initiated by the officers of the board or the Executive Committee. This project team should determine which documents should be destroyed. The Secretary of the board should then execute the shredding/destruction of the documents by using one of the methods noted below.

Once documents reach their expiration date, it is imperative that they are safely discarded. Shredding services can shred documents properly. Organizations can use a mobile shredding device, an off-site shredding service, or purchase one.

Maintain a log identifying all records that were shredded/destroyed, the person who shredded or destroyed the records and the date the records were shredded/destroyed.

E. Step 5: Establish a schedule

Establish a triggering mechanism to initiate a routine clean-up of records. This should be established by the project team which would either be the officers of the board or the Executive Committee.

F. Step 6: Suspension of Record Disposal In Event of Litigation or Claims

In the event The James Blake Foundation is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning The James Blake Foundation or the commencement of any litigation against or concerning The James Blake Foundation, such employee shall inform Greg Badowski and The James Blake Foundation and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

G. Step 7: Applicability

This Policy applies to all physical records generated in the course of The James Blake Foundation's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

H. Approval

This Policy was approved by the Board of Directors of The James Blake Foundation on

_____2/20/2026_____.