

RECORD 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 **Assistance League of Capistrano Valley** in connection with the transaction of corporate business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed (unless under a legal hold). 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 Assistance League's operations by promoting efficiency and freeing up valuable storage space.

Document Retention

Assistance League 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.

File Category	Item	Retention Period
Corporate Records	Bylaws and Articles of Incorporation	Permanent
	Corporate resolutions	Permanent
	Board, regular and special meeting minutes	Permanent
	Conflict-of-interest disclosure forms	4 years
	Endowment originating documents and subsequent amendments	Permanent
Finance and Administration	Financial statements (audited or reviewed)	Permanent
	Auditor management letters	Permanent
	Journal entries	Permanent
	Payroll records	10 years
	Check register and checks	10 years
	Cancelled checks for important payments: purchase of property, taxes, special contracts; attach check to pertinent papers	Permanent
	Bank deposits and statements	10 years
	Charitable organizations registration statements (filed with [State] Attorney General)	10 years
	Chart of accounts	10 years
	Depreciation schedules	10 years
	Inventories of materials and supplies	10 years
	Expense reports	10 years
	General ledgers and end-of-year financial statements	Permanent
	Accounts payable ledger	10 years

File Category	Item	Retention Period
	Accounts receivable ledger	10 years
	Investment performance reports	10 years
	Investment consultant reports	10 years
	Equipment files and maintenance records	10 years after disposition
	Contracts and agreements	Expiration date plus 10 years
	Correspondence – general	4 years
	Correspondence – legal and important matters	Permanent
	Donation records of endowment funds and of significant restricted funds	Permanent
Insurance Records	Policies	Permanent
	Insurance records, current accident reports, claims, policies, etc.	Permanent
	Fire inspection records	10 years
	Safety (OSHA) reports	10 years
Real Estate	Deeds	Permanent
	Leases	Expiration date plus 10 years
	Mortgages, purchase and security agreements	Expiration date plus 10 years
Tax	IRS exemption determination and related correspondence	Permanent
	IRS Form 990's	Permanent
	Withholding tax statements	10 years
	Correspondence with legal counsel or accountants, not otherwise listed	10 years after return is filed
Communications	One set of all communication documents kept on-site and one kept off-site	
	Press releases	Permanent
	Annual reports	Permanent
	Other publications	10 years
	Photos/Photo releases	10 years
	Press clippings	10 years
Donor Services	Correspondence – acknowledgment of gifts and grant requests	Permanent
	Donor fund statements	Permanent
Philanthropic Programs	Program selection reports	Permanent
	Scholarship grant records	10 years
	Agreements with other organizations	Expiration date plus 10 years
Human Resources	Employee personnel files	Permanent or 10 years after termination
	Retirement and pension records including Summary Plan Descriptions (ERISA)	Permanent

File Category	Item	Retention Period
	Employee medical records	Permanent
	Employee handbooks	Permanent
	Workers comp claims	10 years after settlement
	Employee time records	10 years
	Employee orientation and training materials	10 years after use ends
	Employment offer letter	10 years after all obligations end
	Employment applications	4 years
	IRS Form I-9 (store separate from personnel file)	Greater of 1 year after end of service, or 4 years
	Resumes	1 year
Technology	Software licenses and support agreements	10 years after all obligations end
Library	Other organizations' annual reports	2 years
	Directories and periodicals	2 years
General Administration	Correspondence - general	10 years
	Correspondence – legal and important matters	Permanent

Electronic Documents and Records

Electronic documents shall 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 e-mail 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

Assistance League’s records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping Assistance League operating in an emergency will be duplicated or backed up at least every month and maintained off-site.

Document Destruction

Assistance League’s Treasurer 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.

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