

National Center for Family Philanthropy

RECORD RETENTION POLICY

The National Center for Family Philanthropy has adopted a Record Retention Policy that governs retention and disposal of all National Center for Family Philanthropy records. The policy aims to:

- Ensure that certain types of records are maintained in accordance with applicable federal and state laws;
- Preserve records that may be relevant to pending or anticipated judicial proceedings;
- Ensure that records necessary to National Center's business operations are available when needed; and
- Provide the routine removal of records that need not be retained to minimize storage costs, maximize file and office space, and eliminate unnecessary document inventories.

With these purposes in mind, the National Center for Family Philanthropy has adopted this policy, which all employees are required to adhere to.

DEFINITION OF "RECORD"

The term "record(s)" includes written, printed, recorded material and electronic data files from which records can be obtained. Records are found in National Center for Family Philanthropy files both active and inactive, and both on-site as well as off-site. Examples include letters, notes, memorandum, voice mail messages, faxes, charts, spreadsheets, reports, studies, contracts and other documents.

The term "record(s)" does not include published information and other materials readily available to the public from sources other than National Center for Family Philanthropy (e.g. newspapers, vendor brochures, and government regulations). Moreover, the term does not include copies of personal records and that have been provided by National Center for Family Philanthropy for personal use (eg. Pay stubs, medical claim forms, and copies of personnel files).

POLICY

1. General policy for records

Subject to the exceptions described in Section 2 below, records in general should not be retained for more than two years (or three years in certain cases as deemed necessary).

While it should generally be assumed that the two year record retention period applies to any type of record not listed on the attached schedule, each individual must exercise common sense in determining whether a record falls outside the general two year rule. If an employee is unsure of what category a particular record falls into or if there may be circumstances that warrant a deviation from the stated policy, staff should consult with the Vice President of Finance and Administration.

2. *Exceptions to general policy*

Key Documents with Specific Retention Periods:

The attached schedule sets forth appropriate retention periods for various types of records, which do not fall under the general two year retention rule. These documents include key corporate records, accounting records, insurance records, legal records, personnel records, real estate records, tax records, and records by department (e.g. committee documents, testimony and reports). **Retention periods may increase by government regulation, judicial or administrative consent order, private or government contract, pending litigation or audit requirements. Such notifications or events may change the requirements listed in this policy and the attached schedule.**

Legal Proceedings:

Once any employee has any knowledge of an actual or potential legal investigation, claim, proceeding, or suit, all records, including documents and emails, that are or may be relevant to the matter; are reasonably likely to be requested during discovery; or are the subject of pending discovery request, must be preserved until the matter is concluded. Thus, all destruction and discarding of such records must be immediately suspended until employees are further directed.

Special Circumstances

In rare circumstances not anticipated by these procedures, there may be a compelling reason to keep certain records beyond their ordinary retention periods. As soon as an employee believes the retention period for a record should be extended, it will be the employee's responsibility to request an extension from his/her supervisor and to demonstrate a valid business purpose for it. The supervisor, with the Vice President for Finance and Administration will decide whether to authorize the extension. Extensions will be granted sparingly, and only for the shortest reasonable time periods.

3. *Special procedures for maintaining electronic records*

The following procedures have been put in place to maintain efficient operation of our IT systems and ensure that electronic records for which there is no reason for retention are routinely disposed of in a timely manner.

Emails:

- All emails are automatically archived after 180 days. Failure to archive emails may result in a loss of emails.
- Archived emails are subject to the rest of the retention policy as set forth in this document (i.e., generally emails should not be kept more than two years, unless they are a record listed on the attached schedule).

Electronic Files

- All documents will remain on the shared and user drives for 3 years, unless an employee places them in an archive file (each area will have a file named “archive” placed in its directory).
- All documents older than 3 years which have not been placed in an archived file are removed from the shared and user drives and placed onto a back-up system for 5 years. Employees may access documents on the back-up system by making a request.
- All documents which have been on the shared and user drives for 3 years and then on the back-up system for 5 years are purged.

PLEASE NOTE THAT STAFF WILL NOT BE ABLE TO RETRIEVE PURGED EMAILS OR ELECTRONIC FILES THAT WERE NOT ARCHIVED OR PLACED ON A BACK-UP SYSTEM. THUS, IT IS IMPERATIVE THAT EACH EMPLOYEE REVIEW THEIR ELECTRONIC FILES ON A REGULAR BASIS, ARCHIVE RECORDS WHEN NECESSARY AND APPROPRIATELY MANAGE THEIR ELECTRONIC FILES.

Schedule

The following table provides the minimum requirements.

Type of Document	Minimum Requirement
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank reconciliations	7 years
Bank statements	7 years
Checks (for important payments and purchases)	permanently
Contracts, mortgages, notes and leases (expired)	7 years
Contracts (still in effect)	Permanently
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	7 years
Employment applications	3 years
Expense Analyses/expense distribution schedules	7 years
Year End Financial Statements	7 years
Insurance Policies (expired)	3 years
Insurance records, current accident reports, claims, Policies, etc.	Permanently
Internal audit reports	3 years
Inventories of products, materials, and supplies	7 years
Invoices (to customers, from vendors)	7 years
Minute books, bylaws and charter	Permanently
Patents and related papers	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years
Retirements and pension records	Permanently
Tax returns and worksheets	Permanently
Timesheets	7 years
Trademark registrations and copyrights	Permanently
Withholding tax statements	7 years