

## **Records Retention Policy**

**Purpose:** 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. This policy is designed to ensure compliance with appropriate state and federal requirements.

#### **Electronic Documents and Records;**

Electronic documents will be retained as if they were paper documents and follow the record retention schedule. Email records, when identified as records that should be retained, should be printed and retained as paper records.

#### **Emergency Planning:**

Records that are identified as essential to keeping CWB operating in an emergency will be stored electronically so that they may be accessed remotely should CWB's record documents be destroyed or become inaccessible.

#### **Document Destruction:**

CWB's Finance Manager will be responsible for the ongoing process of identifying records that have met the retention period and overseeing their destruction. Financial and personnel records will be destroyed by shredding.

## **Suspension of Document Destruction:**

If a lawsuit, claim or other legal proceeding, or government investigation or government inquiry is pending or threatened against CWB, all records related to the matter are automatically re-classified as permanent records until such time that legal council advises that the records may be destroyed.

#### **Compliance:**

CWB's Finance Manager will periodically review the retention policy with legal council and or CWB's accountants to ensure compliance with new or revised regulations.

## **Record Retention Schedule:**

See attachment A for CWB's record retention schedule.



## Attachment A

# **CWB Document Retention Schedule**

Record Category	Record Type	Minimum Retention Requirement
Finance/Audit/Tax		
"3": retain for 3 years	Accounts Payable	7
"7": retain for 7 years	Accounts Receivable	7
"P": Permanent	Audit Reports/External	Р
retention		
	Audit Report/Internal	3
	Bank Deposit Slips	7
	Bank Statements/Reconciliations	7
	Broker Account Statements/securities	Р
	Budgets (board approved)	Р
	Charitable Solicitation Renewal	7
	Chart of Accounts	Р
	Check Registers	7
	Cancelled Checks for standard transactions	7
	Cancelled Checks for asset	Р
	purchases/legal/taxes	
	Depreciation Schedules	Р
	Financial Reports /Internal	7
	Financial Reports/Board/Year End	Р
	Fixed Asset Records (Acquisition, Sale,	Р
	Appraisal)	
	Inventories	7
	Invoices	7
	Journal Entries	7
	Tax Returns Federal or State	7
	Tax related correspondence (state or federal)	Р
Administration/Legal		
	Building and Equipment Leases	7 (after
		termination of
		lease)
	Contracts/Agreements	7 (after date of
		expiration)
	Computer Software Licenses	7 (after date of
		expiration)
	Copyright Permissions for Use of Others'	Р



	Copyrighted Material	
	Incident Report – Injury (Staff, Program	7
	participant or Visitor)	
	Incident Report – (Boats)	7
	Insurance Policies	Р
	Student/Participant Waivers	7
Personnel Records		/
I el sonnel Recolus	Panafit Diana Dian Degumenta Summany	Р
	Benefit Plans – Plan Documents, Summary	r
	Plan Descriptions, and same for superseded	
	plans	
	Compensation studies/determinations related	7
	to compensation of Directors, Officers, Key	
	Employees	
	Employee Personnel Files (current employee)	Retained
		during active
		employment
	Employee Personnel Files (inactive)	6 (after
	Staff Employment Agreements, Annual	employment
	Evaluation, Background Check, I-9 Forms)	ends)
	Employment Applications (recruitment and	6
	records pertaining to hire/no-hire decisions)	0
		7
	Employee Withholding Statements	7
	Payroll Earnings Records/biweekly	
	Personnel Policies	7 (from
		expiration of
		policy)
	Retirement and Pension Plans	Р
	Time Cards/Sheets	7
	Training Manuals	Р
	Workers Compensation Claims	7 (after
	1	completion of
		claim)
	W2's	7
	1099's	7
	Volunteer Records (active)	, Р
		-
	Volunteer Records (in-active)	2 (after
		volunteer
		becomes
~		inactive)
Contributions/ Fundraising/Grants		
	Donor Correspondence	7 (after donor
	*	becomes
		inactive)
	Donations – cash	7
		'



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	Donations – non cash	7
	Grant Awards/approved	7 (from date of
		final report)
	Grant Awards/denied	1 (from date of
		rejection)
	Grant Award Letters/Agreements	7 (from date of
		final report)
	Grant Invoicing and Supporting Documents	7 (from date of
		final grant
		report)
	Grant Reports	7 (from date of
		final grant
		report
	Membership Records	7 (from date
		member
		becomes
		inactive)
	Promotional/Sponsorship material	7
Corporate/Board	Corporate	
	Annual Reports	Р
	Articles of Incorporation	Р
	Bylaws	Р
	Conflict of Interest Disclosures	7
	Contracts/Leases in effect	Р
	Contracts/Leases after expiration	7
	Correspondence/general	3
	Correspondence/legal	P
	Insurance Policies	Р
	IRS determination letter	
	Licenses	Р
	Policies	P
	Resolutions/Minutes/Agendas	P
	Safety Records	P
		1