

## **Document Retention Policy (approved 3/25/14)**

It is Pioneer Springs Community School's policy to maintain complete, accurate and high quality records. The purpose of this policy is to ensure that PSCS manages data in an efficient and effective manner, maintains historical records related to its financial and administrative operations, and purges documents as part of its normal management process. By establishing a specific timeline for document purging, this shall also ensure compliance with the Sarbanes-Oxley Act, which prohibits the alteration, falsification or destruction of documents that are part of any official proceeding. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed.

No officer, director, employee, contractor or volunteer of PSCS shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of PSCS. If anyone associated with PSCS becomes aware of any investigation, PSCS shall be notified immediately so that document purging will cease and all relevant documents will be appropriately identified and protected.

### **Public Documents**

The IRS requires a tax-exempt organization to make two tax documents available to the public as long as the organization exists. These are the organization's Form 1023, which is its application for tax-exempt status, and its Form 990 for the current year and previous six years of its existence. The revised Form 990 specifically asks how the nonprofit will make these documents available. A nonprofit may post these documents online or produce them upon request.

### **Electronic Documents**

The Sarbanes-Oxley Act's requirement that a nonprofit maintain its documents also applies to electronically stored documents. Documents in electronic form may be requested during a lawsuit or investigation under Federal Rule of Civil Procedure 26. Because they may be involved in a federal investigation or lawsuit, destroying these documents in anticipation of an investigation or lawsuit, can leave the nonprofit open to criminal penalties under the act.

### **Definitions**

1. "Document" refers to any item listed in the table below, in either hard copy, or electronic form. Electronic files also include those in audio/visual or emailed forms.
2. "Administrative" refers to documents pertinent to the day-to-day operations of PSCS.
3. "Historic" refers to documents that are valuable for maintaining knowledge of the history of PSCS and its work.
4. "Legal" refers to any document that is a contract or agreement between parties, that contain financial information relevant to IRS filings, or that must be maintained to comply with

laws and regulations.

5. "Recycle/scrap paper" includes disposal by normal recycling methods or reuse as scrap paper for internal printing or note taking.
6. "Shred" means using a shredder machine to properly shred and dispose of documents.
7. "Delete" means to delete an electronic file.

### **Labeling and Storage**

All files, both hard copy and electronic, shall be labeled by topic and year (if applicable).

Electronic copies shall be saved in appropriate folders on a network drive. Hard copies shall be stored in file cabinets, or archived. Archived hard copy files shall be stored in fire, water and animal proof containers, clearly labeled with "PSCS" topic, and year. If documents of similar type and with the same retention and destruction requirements are stored together, they shall also be labeled with a "destroy after" date so that they do not have to be reviewed additional times.

### **Review and Purging**

Review and purging of files may take place in an ongoing manner, but must occur at least every two years in even numbered years, and must follow the minimum retention requirements stated below. Such review and purging must also occur prior to archival storage of any files.

### **Document Drafts**

Once the final copy of a document has been completed, the drafts may be recycled or deleted, unless they are documents of legal value. For documents determined to be of legal value, drafts containing comments shall be saved for a minimum of two years, and drafts without comment may be destroyed once the final version is complete.

### **Document Type and Retention Timeline**

**Document Description****Type****Storage Length****Disposal Method**

Organizational founding documents (e.g. Articles of Incorporation, Bylaws, IRS Letter of Determination)	Legal, historic	Permanently	N/A
Formal meeting notes (e.g. Board, Advisory Committee)	Administrative, historic	Permanently	N/A
Informal (handwritten) meeting notes (e.g. staff meetings)	Administrative	2 years, or longer if topics remain relevant	Recycle/scrap paper
Funded grant proposals, reports, correspondence, etc.	Administrative, historic, legal	7 years after closure	Shred financial and private information, or recycle/scrap; delete electronic version
Rejected grant proposals, correspondence, etc.	Administrative, historic	2 years after rejection	Shred financial and private information, or recycle/scrap; delete electronic version
Timesheets	Administrative, historic, legal	7 years after end of employment	Shred if contains personal information, or recycle/scrap
Expense reports	Administrative, historic, legal	7 years after end of employment	Shred if contains financial information, or recycle/scrap
Budgets	Administrative, historic, legal	7 years	Shred; delete

Subscriptions/memberships	Administrative, historic, legal	2 years after end of subscription	Shred if contains financial information, or recycle/scrap
Employee evaluations	Administrative, historic, legal	7 years while employed, 2 years after end of employment.	Shred; delete
Contracts with, invoices from, vendors	Administrative, historic, legal	7 years after expiration/payment	Shred; delete
Workshop files • Marketing • Attendee list • Invoices from consultants or payment record from attendees • Payments for food/supplies	Administrative, historic, and/or legal	7 years	Recycle/scrap; delete
Contracts with consultants		7 years	Shred
General information		2 years	Recycle/scrap; delete
Topical information	Administrative	2 years, or as long as still relevant	Recycle/scrap; delete
Correspondence (general)	Administrative, historic	2 years or as long as still relevant	Recycle/scrap; delete
Photographs	Administrative, historic		
High quality with details of event		10 years	Recycle/scrap; delete
Photos missing details of event		2 years	
Low quality	2 years		
Press clippings	Historic	Permanently if electronic or a hard copy without electronic backup; 2 years for hardcopy with backup	