

Document Retention and Destruction Policy

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 Community Partners International (“CPI”) in connection with the transaction of organization 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 CPI’s operations by promoting efficiency and freeing up valuable storage space.

Document Retention

CPI 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.

Corporate Records

- Annual Reports to Secretary of State/Attorney General Permanent
- Articles of Incorporation Permanent
- Board Meeting and Board Committee Minutes Permanent
- Board Policies/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 (after expiration) 7 years
- Correspondence (general) 3 years
- Accounting and Corporate Tax Records
- Annual Audits and 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

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

- Payroll Registers Permanent
- State Unemployment Tax Records Permanent
- Earnings Records 7 years
- Garnishment Records 7 years
- Payroll Tax Returns 7 years
- W-2 Statements 7 years

Employee Records

- Employment and Termination Agreements Permanent
- Retirement and Pension Plan Documents Permanent
- Records Relating to Promotion, Demotion or Discharge 7 years after termination
- Accident Reports and Worker's Compensation Records 5 years
- Salary Schedules 5 years
- Employment Applications 3 years
- I-9 Forms 3 years after termination
- Time Cards 2 years

Donor and Grant Records

- Donor Records and Acknowledgment Letters 7 years
- Grant Applications and Contracts 7 years after completion

Legal, Insurance, and Safety Records

- Appraisals Permanent
- Copyright Registrations Permanent
- Environmental Studies Permanent
- Insurance Policies Permanent
- Real Estate Documents Permanent

- Stock and Bond Records Permanent
- Trademark Registrations Permanent
- Leases 6 years after expiration
- OSHA Documents 5 years
- General Contracts 3 years after termination

Electronic Documents and Records

Electronic documents will 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

CPI’s records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping CPI operating in an emergency will be duplicated or backed up at least every week and maintained off-site. Copies of all electronic files and folders are maintained using duplicate online back up systems Dropbox and Carbonite.

Document Destruction

CPI’s operations manager 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.

Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against CPI and its employees and possible disciplinary action against responsible individuals. The manager of operations and finance committee chair will periodically review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.