

Policy #11: Document Retention and Destruction Policy

Purpose

This Document Retention and Destruction Policy of Feeding the Gulf Coast identifies the record retention responsibilities of staff, volunteers, members of the Board of Directors, and outsiders for maintaining and documenting the storage and destruction of the Organization's documents and records.

1. Rules

The Organization's staff, volunteers, members of the Board of Directors and outsiders (i.e., independent contractors via agreements with them) are required to honor these rules: (a) paper or electronic documents indicated under the terms for retention below will be transferred and maintained by the Human Resources, Legal or Administrative staffs/departments or their equivalents; (b) all other paper documents will be destroyed after three years; (c) all other electronic documents will be deleted from all individual computers, data bases, networks, and back-up storage after one year; and (d) no paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation.

2. Terms for Retention

a. Retain Permanently:

Governance Records—Charter and amendments, Bylaws, other organizational documents, governing board and board committee minutes.

Tax Records—Filed state and federal tax returns/reports and supporting records, tax exemption determination letter and related correspondence, files related to tax audits.

Intellectual Property Records—Copyright and trademark registrations and samples of protected works.

Financial Records—Audited financial statements, attorney contingent liability letters.

b. Retain for Ten Years:

Pension and Benefit Records—Pension (ERISA) plan participant/beneficiary records, actuarial reports, related correspondence with government agencies, and supporting records.

Government Relations Records—State and federal lobbying and political contribution reports and supporting records.

c. Retain for six years:

All SNAP Education Records—Contracts, invoices, and receipts.

d. Retain for four years:

All USDA Records—Contracts, invoices, and receipts.

e. Retain for three years:

Employee/Employment Records—Employee names, addresses, social security numbers, dates of birth, INS Form I-9, resume/application materials, job descriptions, dates of hire and termination/separation, evaluations, compensation information, promotions, transfers, disciplinary matters, time/payroll records, leave/comp time/FMLA, engagement and discharge correspondence, documentation of basis for independent contractor status (retain for all current employees and independent contractors and for three years after departure of each individual).

Lease, Insurance, and Contract/License Records—Software license agreements, vendor, hotel, and service agreements, independent contractor agreements, employment agreements, consultant agreements, and all other agreements (retain during the term of the agreement and for three years after the termination, expiration, non-renewal of each agreement).

All Other Electronic Records, Documents, and Files—Correspondence files, past budgets, bank statements, publications, employee manuals/policies and procedures, survey information.

3. Exceptions

Exceptions to these rules and terms for retention may be granted only by the Organization's President & CEO or Chairman of the Board.