

Document and Information Management Policy – A Guide

Disclaimer: This document is not intended as legal advice. Your organizational goals, purpose, bylaws, and values should drive the creation of this document.

Most organizations must keep copies of certain documents for legal, regulatory, and/or operational reasons. Organizations committed to good business practices and upholding the laws and regulations that govern their operations regularly review these policies to stay current.

The complexity of this policy depends on the complexity of the organization and the documents both created and retained. Below is a typical list of documents and the IRS guidelines for retention and destruction.

ORGANIZATION

Adopted/Amended __/__/20__

Responsibility: Board of Directors

This policy was adopted by the Board on _____ date.

The board must periodically review the retention of documents to ensure proper application and continued relevance.

Section 1. Introduction

The goal of this policy is to outline for employees of the organization the proper procedures for storing and disposing of both electronic and paper documents.

This document represents the policy of ORGANIZATION with respect to the management of official documented work and long-term content of the organization. Within that stated purpose, there are three policy goals:

1. Preserve for specific periods certain records necessary to carry out ORGANIZATION's mission and meet legal, regulatory, community, and historical requirements
2. Retain other records for the period of their immediate, current use
3. Permit orderly destruction of records no longer needed by ORGANIZATION

The following terms apply to this policy:

- **Records Ownership.** For this policy, the term "records" covers paper, electronic files, including e-mail and voicemail records, regardless of where the records are stored, i.e., network servers,

desktop or laptop computers, portable electronic devices, and other wireless devices with text message capabilities. All ORGANIZATION records are the property of ORGANIZATION.

- **Document Destruction.** A hard copy of documents will be destroyed by shredding or fire after they have been retained until the end of the document retention schedule, which is outlined below. Copies of computer backups will be destroyed by fire or other proven means to destroy such media after they have been retained until the end of the document retention schedule.
- **Limits on Destruction.** All permitted document destruction shall be halted if the organization is being investigated by a governmental law enforcement agency, and routine destruction shall not be resumed without the written approval of legal counsel and the President/CEO.
- **Electronic Documents and Document Integrity.** Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the document retention schedule. Because the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the President/CEO shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system provided that such standards shall only be implemented to the extent that they are reasonably attainable, considering the resources and other priorities of the organization.
- **Emergency Planning.** Documents (hard copy, online, or other media) will be stored in a protected environment for the duration of the document retention schedule. Computer backup media, including that performed by a third party, will be included. Documents, which are necessary for the continued operation of the organization in the case of an emergency, shall be regularly duplicated or backed up and maintained in an off-site location.

Section 2. Business Records

A business record is any print or electronic document created and maintained in the ordinary course of business. However, not every document constitutes a business record that must be kept. A document should be retained if it contains business activities that have evidentiary or reference value, or if it is the sole copy of a document. This includes, for example, job offers, contract negotiations where final pricing is set, or a policy memo. It does not include, for example, in-progress drafts, discussions, or negotiations, received copies of policy memos where an original already exists, or non-business correspondence.

Section 3. Record Retention Schedule

The following table lists all document types created and maintained by the organization that qualify as business records. For each document type, a mandatory retention schedule and method of disposal have been stipulated, in addition to storage locations.

Document Type	Document Owners(s)	Onsite Storage (Years)	Onsite Storage Location	Offsite Storage (Years)	Offsite Storage Location	Total Years Stored	Method of Disposal
A. Accounting and General Records							
B. Payroll Records							
C. Other							

Example of a schedule based on current rules

Accounting and Finance

Accounts payable	7 years
Accounts receivable	7 years
Annual financial statements and audit reports	Permanent
Bank statements, reconciliations and deposit slips	7 years
Canceled checks – routine	7 years
Canceled checks – special, such as loan repayment	Permanent
Credit card receipts	3 years
Employee/business expense reports/documents	7 years
General ledger	Permanent
Interim financial statements	7 years

Contributions/Gifts/Grants

Contribution records	Permanent
Documents evidencing terms of gifts	Permanent
Grant records	7 years after end of grant

Corporate and Exemption

Articles of incorporation and amendments	Permanent
Bylaws and amendments	Permanent
Minute books, including board and committee minutes	Permanent
Biennial reports to the State of Alaska	Permanent
Other corporate filings	Permanent
IRS exemption application (Form 1023 or 1024)	Permanent
IRS exemption determination letter	Permanent
Licenses and permits	Permanent
Employer identification (EIN) designation	Permanent

Correspondence and Internal Memoranda

Hard copy correspondence and internal memoranda relating to a particular document otherwise addressed in this schedule should be retained for the same period as the document to which they relate.

Hard copy correspondence and internal memoranda relating to routine matters with no lasting significance	Two years
Correspondence and internal memoranda important to organization or having lasting significance	Permanent, subject to review

Electronic mail (email) to or from the organization

Electronic mail (email) relating to a particular document otherwise addressed in this schedule should be retained for the same period as the documents to which they relate but may be retained in hard copy form with the document to which they relate.

Emails considered important to the organization or of lasting significance should be printed and stored in a central repository.	Permanent, subject to review
Emails not included in either category above	12 months

Electronically Stored Documents

Electronically stored documents (e.g., in PDF, text or other electronic format) comprising or relating to a particular document otherwise addressed in this schedule should be retained for the same period as the document which they comprise or to which they relate but may be retained in hard copy form (unless the electronic aspect is of significance).

Electronically stored documents considered important to the organization or of lasting significance should be printed and stored in a central repository (unless the electronic aspect is of significance).	Permanent, subject to review
Electronically stored documents not included in either of the above categories	Two years

Employment, Personnel, and Pension

Personnel records	10 years after employment ends
Employee contracts	10 years after termination
Retirement and pension records	Permanent

Insurance

Property, D&O, workers' compensation and general liability insurance policies	Permanent
Insurance claims records	Permanent

Legal and Contracts

Contracts, related correspondence and other supporting documentation	10 years after termination
Legal correspondence	Permanent

Management and Miscellaneous

Strategic plans	7 years after expiration
Disaster Recovery and Business Continuity Plan	7 years after replacement
Administrative and Financial Policies Manual	Current version and revision history
Employee Handbook	Current version and revision history

Property – Real, Personal, and Intellectual

Property deeds and purchase/sale agreements	Permanent
Property tax	Permanent
Real property leases	Permanent
Personal property leases	10 years after termination
Trademarks, copyrights, and patents	Permanent

Tax

Tax exemption documents and correspondence	Permanent
IRS rulings	Permanent
Annual information returns – federal and state	Permanent
Tax returns	Permanent

Section 4. Policy Suspension

In some instances, this Document Retention Policy may be temporarily suspended, specifically if an investigation, litigation, or audit is anticipated. In some instances, this policy's disposal schedule may conflict with the need to produce documents relevant to the aforementioned legal or regulatory procedures. If this is the case, then the need to comply fully with the law and/or regulation will override this policy, causing this policy to be temporarily suspended until the matter in question is satisfactorily resolved. Suspension of this policy will take the form of no business documents being disposed of whatsoever for a period of time.

Section 5. Policy Non-Compliance

It violates this policy to dispose of any business document types named in the retention schedule above. If you believe you have accidentally disposed of or destroyed a business document, please contact the policy administrator listed below immediately, as the document may still be retrievable or salvageable, or may exist elsewhere as a copy. Your honesty in coming forward will have a significant positive impact on disciplinary action taken, if any. If you know of anyone willfully disposing of or destroying any business documents of the organization, you are under an obligation to report these activities to the policy administrator listed below.

Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. Failure to report known violations of this policy will be handled very seriously.

Section 6. Contacts

If you have any questions or concerns regarding this policy, or would like to report a policy violation, contact _____.

Declaration of Understanding

I, _____, have read, understand, and agree to adhere to the ORGANIZATION Document Retention and Destruction Policy.

Name (Printed): _____

Name (Signed): _____

Today's Date: _____