

# CSRA-WGA DOCUMENT RETENTION AND DESTRUCTION POLICY

## 1. Policy and Purposes

This Retention and Destruction Policy identifies the record retention and destruction responsibilities of the CSRA volunteers and Board members for maintaining and documenting the storage and destruction of the organization's hard copy and electronic documents and records. The Policy provides for (a) retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; (c) protection of personal data of membership; and (d) guidance for the Board of Directors, officers, and other constituencies with respect to their responsibilities concerning document retention and destruction. Documents that age past the timelines defined below shall be destroyed. The organization reserves the right to revise or revoke this Policy at any time.

Revenue Procedure 71-17 details the recordkeeping requirements for social clubs that conduct activities with nonmembers. The records must distinguish one type of income from another (gambling income vs. food sales income) and one type of expense from another.

Clubs that allow nonmembers to use their facilities must collect and maintain certain information. The information collected for an event should include:

- Date
- Total number in the party
- Number of nonmembers in the party
- Total charges
- Charges attributable to nonmembers
- Charges paid by nonmembers
- Where a member pays all or part of the charges attributable to nonmembers, a statement signed by the member indicating whether he or she has been or will be reimbursed for such nonmember use and, if so, the amount of the reimbursement.

Failure to keep records that distinguish the types and sources of income and expenses will result in a presumption that all income is unrelated to the CSRA exempt purpose and therefore subject to unrelated business income tax.

## 2. Administration

### 2.1 Responsibilities of the Administrator.

The Treasurer and Secretary shall be the administrators ("Administrator") in charge of the administration of this Policy. The Administrators' responsibilities shall include

- (a) supervising and coordinating the retention and destruction of documents in accordance with the schedule below;

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- (b) documenting the actions taken to maintain and/or destroy organization documents; and
- (c) modifying the Document Retention Schedule as necessary to comply with law and/or to include additional or revised document categories as needed.

## **2.2 Responsibilities of Staff, Board Members, Volunteers, Etc**

All Board members and volunteers shall be familiar with this Policy, shall adhere to the schedule, and shall assist the Administrator, as requested, in implementing it. Board members and volunteers will turn in all CSRA documentation when they are no longer associated with the CSRA. In the event a vendor is provided documentation related to the CSRA the vendor will return all documentation to the CSRA upon completion of their task.

## **3. Suspension of Document Destruction; Compliance.**

In the event litigation, audit or a government investigation is reasonably expected or the CSRA is informed of such an event, any documents relevant to the event shall be retained until it is determined that the documents are no longer required, regardless of their age. Upon hearing of such an event, the Administrator should ensure all Board members are aware of the temporary exception to the destruction schedule.

## **4. Electronic Documents; Document Integrity.**

Documents stored and archived in electronic format shall be maintained in a manner that ensures document integrity, thus minimizing the opportunity for alterations to the documents. The Administrator has the responsibility 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. Permanent archiving and storage of documents will have limited accessibility.

## **5. Emergency Planning.**

Documents shall be stored in a safe and accessible manner. Documents shall be retained in accordance with this schedule and stored, to the extent possible, electronically on an off-line hard drive. In the event electronic storage is not reasonable, hard copy documentation should be retained in off site location.

## **6. Document Creation and Generation.**

The Administrator shall discuss with the Board the ways in which documents are created or generated. With respect to each organizational function, the Administrator shall attempt to

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determine whether documents are created which can be easily segregated from others, so that, when it comes time to destroy (or retain) those documents, they can be easily culled from the others for disposition. For example, on a Board member by Board member basis, are e-mails and other documents of a significantly non-sensitive nature so that they might be deleted, even in the face of a litigation hold with respect to other, more sensitive, documents? This dialogue may help in achieving a major purpose of the Policy -- to conserve resources -- by identifying document streams in a way that will allow the Policy to routinely provide for destruction of documents. Ideally, the organization will create and archive documents in a way that can readily identify and destroy documents with similar expirations.

## 7. Document Retention Schedule.

<u>Document Type</u>	<u>Retention Period</u>
<b>Accounting and Finance</b>	
Accounts Payable	7 years
Accounts Receivable	7 years
Approved Budgets	7 Years
Year End Financial Statement	Permanent
Audit Reports	Permanent
Bank Statements, Reconciliations & Deposit Slips	7 years
Expense Reports/Documents	3 years
General Ledger	7 Years
Interim Financial Statements	3 years
Loan Documents	7 Years after Termination
I-990 Tax Documents	7 Years
Non Member Income records	3 Years
<b>Contributions/Gifts/Grants</b>	
Contribution Records	Permanent
Documents Evidencing Terms of Gifts	Permanent
Grant Records	7 yrs. after end of grant period
<b>Corporate and Exemption</b>	
Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Board & Committee Minutes	Permanent
Reports to Attorney General	Permanent
Reports to Secretary of State	Permanent
Other Corporate Filings	Permanent
IRS Exemption Application (Form 1023 or 1024)	Permanent
IRS Exemption Determination Letter	Permanent
State Exemption Application (if applicable)	Permanent
State Exemption Determination Letter (if applicable)	Permanent

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Licenses and Permits	Permanent
Employer Identification (EIN) Designation	Permanent

## **Employee/Board Member/Member Related Documents**

Checks Provided by Members	Until Bank Clearance
Identification Data of Members	Until departure from Org.

<b>Insurance Documents</b>	Permanent
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## **Legal and Contracts**

Contracts and related correspondence	7 Years after Expiration
Legal correspondence	Permanent

## **Management and Miscellaneous**

Policies and Procedures Manual	Current with revision history
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## **Tax**

Tax exemption documents & correspondence	Permanent
IRS Rulings	Permanent
Annual information returns – federal & state	Permanent
Tax returns	Permanent

## **Correspondence and Internal Memoranda**

Any correspondence (hard copy or electronic) and internal memoranda relating to a particular document addressed in this Schedule should be retained for the same period as the document to which they relate.

All other Correspondence	2 years
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