Keys for Kids Ministries

RECORD RETENTION AND DESTRUCTION POLICY

1) Policy

This Policy represents Keys for Kids Ministry's policy regarding the retention and disposal of records and electronic documents.

2) Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention, and disposal schedule for physical records of Keys for Kids and the retention and disposal of electronic documents. The Business Administrator (the "Administrator") is the senior staff member in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

The Administrator is also authorized to

- make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state, and federal laws and includes the appropriate document and record categories for Keys for Kids.
- monitor local, state, and federal laws affecting record retention;
- annually review the record retention and disposal program; and
- monitor compliance with this Policy.

3) Suspension of Record Disposal in Event of Litigation or Claims

In the event Keys for Kids is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Keys for Kids, or may reasonably be aware of any anticipated litigation against or concerning Keys for Kids such employee shall inform the Administrator and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

4) Applicability

This Policy applies to all physical and electronic documents and records generated in the course of Keys for Kids operation, including both original documents and reproductions.

This Policy was approved by the Board of Directors of Keys for Kids Ministries on

By Arryon H In Title Executive Director

Appendix A - Record Retention Schedule

The Record Retention Schedule is organized as follows:

SECTION TOPIC

- A. Accounting and Finance
- B. Contracts
- C. Corporate Records
- D. Electronic Documents
- E. Payroll Documents
- F. Personnel Records
- G. Property Records
- H. Tax Records
- I. Contribution Records

The following are some common retention periods. These apply to both physical and electronic documents. If no physical copy of an electronic document is retained, the means to "read" the electronic document must also be retained.

A. ACCOUNTING AND FINANCE

| Record Type | Retention Period |
|--|-----------------------------------|
| Accounts Payable & Accounts Receivable ledgers and schedules | 7 years |
| Annual Audit Reports and Financial Statements | Permanent |
| Annual Audit Records, including work papers and other documents that relate to the audit | 7 years after completion of audit |
| Bank Statements and Canceled Checks | 7 years |

| Credit card numbers | Full credit card numbers should not be retained any longer than immediate business needs and merchant account agreements dictate. |
|--|---|
| General Ledgers | Permanent |
| Notes Receivable ledgers and schedules | 7 years |

B. CONTRACTS

| Record Type | Retention Period |
|--|---|
| Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation) | 7 years after expiration or termination |

C. CORPORATE RECORDS

| Record Type | Retention Period |
|--|------------------|
| Corporate Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of incorporation, bylaws, annual corporate reports) | Permanent |
| Licenses and Permits | Permanent |

D. ELECTRONIC DOCUMENTS

- **1. Electronic Mail**: Not all e-mail needs to be retained, depending on the subject matter.
 - Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
 - Staff will not store or transfer Keys for Kids-related e-mail on non-workrelated computers except as necessary or appropriate for Keys for Kids purposes.
 - Staff will take care not to send confidential/proprietary Keys for Kids information to outside sources.
- **2. Electronic Documents:** including Microsoft Office Suite and PDF files. Retention depends on the subject matter.

3. Web Page Files: Internet Cookies

 All workstations: Web browsers should be scheduled to delete cookies once per month.

If an electronic document is reproduced into paper form, the official document will be considered the electronic document.

E. PAYROLL DOCUMENTS

| Record Type | Retention Period |
|--|---------------------------|
| Employee Deduction Authorizations | 4 years after termination |
| Payroll Deductions | Termination + 7 years |
| W-2 and W-4 Forms | Termination + 7 years |
| Garnishments, Assignments, Attachments | Termination + 7 years |
| Payroll Registers (gross and net) | 7 years |
| Time Cards/Sheets | 2 years |
| Unclaimed Wage Records | 6 years |

F. PERSONNEL RECORDS

| Record Type | Retention Period |
|---------------------------------------|-------------------------|
| Commissions/Bonuses/Incentives/Awards | 7 years |
| Employee Earnings Records | Separation + 7 years |
| Employee Handbooks | 1 copy kept permanently |

| Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records) | 6 years after separation |
|---|--|
| Employment Contracts – Individual | 7 years after separation |
| Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings | 3 years from date of hiring decision |
| Employment Records - All Non-Hired Applicants (including all applications and resumes – whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence) | 2-4 years (4 years if file contains any correspondence which might be construed as an offer) |
| Job Descriptions | 3 years after superseded |

| Personnel Count Records | 3 years |
|-------------------------|---|
| Forms I-9 | 3 years after hiring, or 1 year after separation if later |

PROPERTY RECORDS

| Record Type | Retention Period |
|--|------------------|
| Correspondence, Property Deeds, Assessments, Licenses, Rights of Way | Permanent |
| Property Insurance Policies | Permanent |

G. TAX RECORDS

| Record Type | Retention Period |
|---|------------------|
| Tax-Exemption Documents and Related Correspondence | Permanent |
| IRS Rulings | Permanent |
| Payroll Tax Records | 7 years |
| Tax Bills, Receipts, Statements | 7 years |
| Tax Returns – Income, Franchise, Property | 7 years |

| Tax Workpaper Packages – Originals | 7 years |
|--|---------------------------------|
| Sales/Use Tax Records | 7 years |
| Annual Information Returns - Federal and State | 7 years/destroyed after 7 years |
| IRS or other Government Audit Records | Permanent |

CONTRIBUTION RECORDS

| Record Type | Retention Period |
|--|----------------------------------|
| Records of Contributions | 7 years |
| Documents evidencing terms, conditions, or restrictions on gifts | 7 years after funds are expended |