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Attachments:	None
Approved by:	Board
Effective Date:	11/15/17
Date Revised:	11/15/17

BRIGHT PROSPECT DOCUMENT RETENTION AND DESTRUCTION POLICY

1. Policy and Purposes

This Policy represents the policy of Bright Prospect with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may merely be referred to as “Documents” in this Policy). Purposes of the Policy include (a) retention and maintenance of Documents necessary for the proper functioning of Bright Prospect as well as to comply with applicable legal requirements; (b) destruction of Documents which no longer need to be retained; and (c) guidance for the Board of Directors, officers, staff and other constituencies with respect to their responsibilities concerning Document retention and destruction. Notwithstanding the foregoing, Bright Prospect reserves the right to revise or revoke this Policy at any time.

2. Responsibilities

2.1 Responsibilities of the Administrator. Bright Prospect’s Office Manager shall be the administrator (“Administrator”) in charge of the administration of this Policy. The Administrator’s responsibilities shall include supervising and coordinating the retention and destruction of Documents pursuant to this Policy and particularly the Document Retention Schedule included below. The Administrator shall also be responsible for Documenting the actions taken to maintain and/or destroy Bright Prospect Documents and retaining such Documentation. The Administrator may also modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised Document categories as may be appropriate to reflect Bright Prospect policies and procedures. The Administrator is also authorized to periodically review this Policy and Policy compliance with legal counsel and to report to the Board of Directors as to compliance. The Administrator may also appoint one or more assistants to assist in carrying out the Administrator’s responsibilities, with the Administrator, however, retaining ultimate responsibility for administration of this Policy.

2.2 Responsibilities of Constituencies. This Policy also relates to the responsibilities of board members, staff, volunteers and outsiders with respect to maintaining and Documenting the

storage and destruction of Bright Prospect’s Documents. The Administrator shall report to the Board of Directors (the board members acting as a body), which maintains the ultimate direction of management. Bright Prospect’s staff shall be familiar with this Policy, shall act in accordance therewith, and shall assist the Administrator, as requested, in implementing it. The responsibility of volunteers with respect to this Policy shall be to produce specifically identified Documents upon request of management, if the volunteer still retains such Documents. In that regard, after each project in which a volunteer has been involved, or each term which the volunteer has served, it shall be the responsibility of the Administrator to confirm whatever types of Documents the volunteer retained and to request any such Documents which the Administrator feels will be necessary for retention by Bright Prospect (not by the volunteer). Outsiders may include vendors or other service providers. Depending upon the sensitivity of the Documents involved with the particular outsider relationship, Bright Prospect, through the Administrator, shall share this Policy with the outsider, requesting compliance. In particular instances, the Administrator may require that the contract with the outsider specify the particular responsibilities of the outsider with respect to this Policy.

3. Suspension of Document Destruction; Compliance. Bright Prospect becomes subject to a duty to preserve (or halt the destruction of) Documents once litigation, an audit or a government investigation is reasonably anticipated. Further, federal law imposes criminal liability (with fines and/or imprisonment for not more than 20 years) upon whomever “knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, Document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States ... or in relation to or contemplation of any such matter or case.” Therefore, if the Administrator becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the Administrator shall immediately order a halt to all Document destruction under this Policy, communicating the order to all affected constituencies in writing. The Administrator may thereafter amend or rescind the order only after conferring with legal counsel. If any board member or staff member becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, with respect to Bright Prospect, and they are not sure whether the Administrator is aware of it, they shall make the Administrator aware of it. Failure to comply with this Policy, including, particularly, disobeying any destruction halt order, could result in possible civil or criminal sanctions. In addition, for staff, it could lead to disciplinary action including possible termination.

4. Electronic Documents; Document Integrity. Documents in electronic format shall be maintained just as hard copy or paper Documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic Documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Administrator 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 Bright Prospect.

5. Privacy. It shall be the responsibility of the Administrator, after consultation with counsel, to determine how privacy laws will apply to Bright Prospect's Documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

6. Emergency Planning. Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of Bright Prospect in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Administrator shall develop reasonable procedures for Document retention in the case of an emergency.

7. Document Creation and Generation. The Administrator shall discuss with staff the ways in which Documents are created or generated. With respect to each employee or Bright Prospect function, the Administrator shall attempt to 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 an employee-by-employee 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, Bright Prospect will create and archive Documents in a way that can readily identify and destroy Documents with similar expirations.

8. Document Retention Schedule.

<u>Document Type</u>	<u>Retention Period</u>
Accounting and Finance	
Accounts Payable	7 years
Accounts Receivable	7 years
Annual Financial Statements and Audit Reports	Permanent
Bank Statements, Reconciliations & 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 period
Corporate and Exemption	
Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minute Books, including Board & Committee Minutes	Permanent
Annual Reports to Attorney General & 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
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. For example, correspondence related to contribution records should be permanently retained, while correspondence related to Grants should be retained for 7 years.	
Hard copy correspondence and internal memoranda relating to routine matters with no lasting significance	2 years
Correspondence and internal memoranda important to Bright Prospect or having lasting significance	Permanent

Email to or from Bright Prospect

Electronic mail emails relating to a particular Document otherwise addressed in this Schedule should be retained for the same period as the Document to which they relate, but may be retained in hard copy form with the Document to which they relate. For example, emails related to contribution records should be permanently retained, while emails related to Grants should be retained for 7 years.

Emails considered important to Bright Prospect or of lasting significance should be printed and stored in a central repository.	Permanent, subject to review
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Emails not included in either of the above categories	60 months
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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 Bright Prospect or of lasting significance should be printed and stored in a central repository (unless the electronic aspect is of significance).	Permanent
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Electronically stored Documents not included in either of the above categories	Two years
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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 Plan	7 years after replacement
Policies and Procedures Manual	Current version with 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 & correspondence	Permanent
IRS Rulings	Permanent
Annual information returns – federal & state	Permanent
Tax returns	Permanent
