



DOCUMENT AND RECORD RETENTION POLICY

Purpose: To clarify practices related to the retention and destruction of documents and records of the Foundation by the Board of Directors, Community Advisory Committee and employees.

Adopted: December 14, 2017

Preamble: In order to retain business records at a manageable level and still comply with all applicable state and federal laws regarding record retention, it is imperative for both for-profit and not-for-profit corporations to develop and adhere to document and record retention and destruction policies. The REACH Healthcare Foundation (“REACH”) is committed to an effective document retention policy that will (i) provide a system for complying with state and federal document retention laws, (ii) ensure that documents necessary to REACH’s business operations are available when needed, and (iii) ensure that documents for which there is no reason for retention are routinely disposed of in a timely manner. With these purposes in mind, REACH has adopted this Document and Record Retention Policy.

Policy:

- A. **Scope.** This Policy applies to all documents and records, whether in tangible or electronic form, that are created or received by REACH in connection with the transaction of its business (each a “Document” and, collectively, the “Documents”). This Policy does not apply to the personal records of REACH’s officers, directors, and employees.
- B. **General Policy.** The attached schedule (the “Retention Schedule”) sets forth the appropriate retention period (the “Retention Period”) for various types of Documents. It shall be the policy of REACH to secure, retain, and store all Documents for their applicable Retention Period. If any two or more Retention Periods conflict, all applicable Documents shall be retained for the longest Retention Period among those conflicting. Any Documents that are not listed in the Retention Schedule, but that are substantially similar to a Document listed in the Retention Schedule, shall be retained for the Retention Period applicable to the similar Document. The Retention Period for all other Documents shall be determined by application of the general principles and guidelines set forth in this Policy, as well as any other pertinent factors. If you are unsure what Retention

Period applies to a particular Document or if you believe that there may be circumstances that warrant a deviation from a stated Retention Period, you should consult with REACH's President and CEO or his/her designee.

- C. **Emails and Other Electronic Documents.** Emails (including attachments) and other electronic Documents shall be retained the same as if they were paper Documents. REACH's officers, directors, and employees are responsible for reviewing their own email and saving all emails and attachments in the appropriate paper and/or electronic file. Any emails that are not saved to a separate file within one-year after receipt will be treated as general correspondence and automatically deleted. All questions regarding whether a particular email or attachment should be saved to a specific file should be directed to the President and CEO or his/her designee.
- D. **Storage of Documents.** All Documents shall be stored in a safe, secure, and accessible manner. This means that important paper Documents should be kept in fireproof file cabinets and electronic Documents should be backed-up in a manner to protect against accidental or deliberate loss. Documents should additionally be stored in a manner where they can be readily identified and retrieved.
- E. **Destruction of Documents.** Unless there is a Suspension (defined in paragraph F below) in effect, all Documents shall be disposed of and destroyed within a reasonable period of time after the expiration of their applicable Retention Period. Any Documents which contain confidential, sensitive, or personally identifiable information shall be disposed of in a manner that renders the Document permanently unreadable or undecipherable, including, for example, by the shredding of paper documents or the complete erasure of electronic information.
- F. **Suspension of Destruction Upon Event of Suspension.** Regardless of any Retention Period established under this Policy, all Document destruction shall be suspended immediately (a "Suspension") upon REACH or any of its officers, directors or employees receiving notice of any pending, ongoing, or threatened litigation or the commencement or contemplation of any investigative proceeding, audit, or review by a governmental authority (each, an "Event of Suspension"). Thereafter, any and all Documents that refer, relate, or pertain to the Event of Suspension must be set aside and retained until the matter is concluded and the President and CEO Directs that the destruction of such Documents should resume. Upon the occurrence of an Event of Suspension, the President and CEO or his/her designee will send out a company-wide alert advising all REACH personnel to secure, set aside, and retain all Documents that refer, relate, or pertain to the Event of Suspension. Other Documents unrelated to the Event of Suspension shall continue to be secured, retained, discarded, and destroyed as outlined in this Policy. All questions regarding the relation of any specific Document to an Event of Suspension shall be directed to the President and CEO or his/her designee.

- G. Compliance and Enforcement. All officers, directors, and employees of REACH are subject to, and expected to comply with the terms of, this Policy. Any violation or breach of this Policy may result in disciplinary action, up to and including termination of employment. REACH additionally reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. Officers, directors, and employees should report any known or suspected violations of this Policy to the President and CEO or his/her designee.

REACH Healthcare Foundation Record Retention Schedule

	Retention Period
Accounts payable ledgers and schedules	7 years
Accounts receivable ledgers and schedules	7 years
Administrative services:	
▪ Telephone traffic records	1 year
▪ Vendor invoices (not Accounting Division copy)	1 year
▪ Fixed Asset Inventory Reports	7 years
Annual Reports	Permanently
Articles of Incorporation (including amendments)	Permanently
Audit reports of accountants	Permanently
Background check reports conducted on applicants to the Board of Directors shall be destroyed by the CEO after the results have been validated and saved in summary form with no personal identifiers other than the candidates' names.	7 days
Ballots and ranking sheets of the Board or CAC used during membership or officer elections	1 year
Exception: A summary ballot and summary ranking sheet of each election result, without attribution to individual members' votes, shall be retained with the minutes of the meeting during which elections were conducted	
Bank statements and reconciliations	7 years
Benefit, pension, and insurance plans, including supporting data	6 years following termination of plan
Board application, nomination and election documents	3 years
By-laws (including amendments)	Permanently
Budget and expense reports	10 years
Cash books	7 years
Charitable organization registration statements	7 years
Checks (canceled) and check registers	7 years
Exception: file canceled checks for certain payments such as taxes, purchases of real property, etc. with and retain for same period as documents pertaining to underlying transaction	
Check requests	7 years

Computerized data and other electronically-recorded information (excluding emails) ⁱ	1 year
Continuing Medical Education All documentation associated with program development, including records verifying physician participation	6 years
Contracts and leases (expired)	7 years
Contracts and leases still in effect	Permanently
Correspondence (general) ⁱⁱ	1 year
Correspondence (legal and important matters only)	Permanently
Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	7 years
Duplicate bank deposit slips	3 years
Employee Occupational Illness, injury or death records (settled cases) logs and summaries	5 years following the end of the calendar year to which they relate
Employee personnel records (after termination, including application, resume, background check results, biography, I-9,W-2, position description, performance evaluations, salary memos, training certification)	7 years after termination
Employee recruitment and anti-discrimination records, including applications, test papers of applicants, advertisements related to job openings and ADA requests for reasonable accommodation	2 years
Employment contracts and agreements	7 years after termination or expiration
Financial statements (year-end)	Permanently
General Journal	7 years
General Ledger	Permanently
Grant Proposals and attachments, summaries, review forms and reports	10 years
Grantmaking Guidelines and Requests for Proposals	5 years
Insurance policies (expired)	
▪ “Claims made” policies	3 years
▪ “Occurrence” policies	Permanently
Insurance records, current incident reports, claims, policies etc.	Permanently
Internal audit and accounting reports (miscellaneous)	2 years
Inventories of products, materials, and supplies	7 years

Investment Contracts	Permanently
Investment Reports (quarterly and year-end)	10 years
Invoices from vendors	7 years
Memorandum of Understanding	Permanently
Minutes of directors, commissions and committee meetings	Permanently
News Releases	10 years
Payroll records and summaries including payments to pensioners and employee records related to mandatory federal taxes	7 years
Permissions (granted and received) for use of intellectual property	Permanently
Petty cash vouchers	3 years
Policies and Procedures (Board, CAC and employee)	Permanently
Printing Services:	
▪ Printing forms, (quotes, work orders, invoices)	3 years
▪ Vendor invoices	1 year
Property appraisals by outside appraisers	Permanently
Property records of properties no longer owned—including costs, depreciation reserves, end-of-year trial balances and depreciation schedules	7 years
Blueprints and plans	Permanently (in Archives)
Strategic Plans	3 years after completion
Tax-exemption documents and related correspondence (e.g., IRS determination letter, Form 1023, Application for Recognition of Exemption Under Section 501(c)(3), sales tax exemption letters and certificates)	Permanently
Tax returns	Permanently
Tax return worksheets, revenue agents' reports and other documents relating to determination of income tax liability	Longer of 7 years or until statute of limitation expires
Trademark, service mark and copyright registrations	Permanently
Voucher register and schedules	7 years
Vouchers for payments to vendors, employees, etc. (includes allowances and reimbursement of employees, officers, etc. for travel and entertainment expenses)	7 years

Note: In the event of pending or threatened legal investigations, claims, proceedings or suits, all records relevant to the matter must be preserved until the matter is concluded.

ⁱ Computerized data and other electronically-recorded information includes, but is not limited to: voice mail messages and files, back-up voice mail files, e-mail messages and files, backup e-mail files, deleted e-mails, data files, program files, backup and archival tapes, temporary files, system history files, web site information stored in textual, graphical or audio format, web site log files, cache files, cookies, and other electronically-recorded information. The Foundation does not intend this list to be exhaustive.

ⁱⁱ If the correspondence pertains to or supports a Document having a prescribed Retention Period, it should be retained for the same Retention Period as the Document that it pertains to or supports. For example, a letter pertaining to a particular contract would be retained for the same amount of time as the contract.