



DOCUMENT AND RECORD RETENTION POLICY

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

Adopted: September 19, 2005

Preamble: In order to retain business records at a manageable level and still comply with all applicable laws and legal requirements in the record keeping area, including, without limitation, any provisions applicable under the expansion of federal law by the Sarbanes-Oxley Act of 2002 by making it a crime for anyone to knowingly alter, destroy, mutilate, conceal, cover up, falsify or make a false entry in any record or document (collectively, a “Document” or “Documents”) with the intent to impair its integrity or availability for use in an official proceeding, 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 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. The attached schedule sets forth the appropriate retention period for various types of Documents. Subject to the exceptions described below, Documents in general should not be retained for more than three years. This policy pertains to the official documents of the Foundation, and does not pertain to the individual Board members’ copies of documents which shall not be subject to this record retention policy.

B. While it should generally be assumed that the three-year Document retention period applies to any type of Document not listed on the attached schedule, each individual must exercise common sense in determining whether a Document falls outside the general “three-year rule.” If you are unsure of what category a particular Document

falls into or if you believe there may be circumstances that warrant a deviation from the stated policy, you should consult with REACH's President and CEO.

C. Regardless of any established Document retention period, once REACH or any officer, director or employee has any knowledge of an actual or potential legal investigation, claim, proceeding, or suit, any and all Documents that they know, or reasonably should know, may be relevant to the matter or is reasonably likely to be requested during discovery and/or is the subject of a pending discovery request, must be preserved until the matter is concluded; thus, all destruction and discarding of such Documents must be immediately suspended (a "Suspension") until further directed by the President.

D. If it is determined that a particular Document should not be destroyed or discarded irrespective of the stated retention period, that Document should be retained as part of a working file or stored in such a manner that it can be readily identified and retrieved. Keep in mind that the definition of the term "Document" is very broad. The category in which you place a particular Document may vary depending on the content of the Document and the relationship of that Document with other Documents. For example, suppose REACH and a supplier enter into a contract, and that, subsequent to the execution of the contract, there is correspondence between REACH and the supplier that is intended to clarify an ambiguous term in the contract. While the correspondence may be a letter, in this case it may become an important Document at a later time, so it should be retained on the same basis as the contract itself.

E. Provided that a Document is not subject to a Suspension and subject to paragraph D above, then the Document should be destroyed or discarded within a reasonable time following the expiration of the applicable retention period therefore, all as verified by 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 years
▪ 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
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 papers pertaining to underlying transaction	
Check requests	7 years
Computerized data and other electronically-recorded information ⁱ	60 days
Continuing Medical Education	6 years
All documentation associated with program development, including records verifying physician participation	

Contracts and leases (expired)	7 years
Contracts and leases still in effect	Permanently
Correspondence (except computerized & other electronically-recorded)	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)	3 years
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	10 years
Financial statements (end-of-years, other months optional)	Permanently
General Journal	7 years
General Ledger	Permanent
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	10 years
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.