



## DOCUMENT RETENTION AND DESTRUCTION POLICY

Purpose In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by Meals on Wheels in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate Meals on Wheels' operations by promoting efficiency and freeing up valuable storage space. Document Retention Meals on Wheels follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

<b>Corporate Records</b>	
Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
Construction Documents	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Contracts (after expiration)	7 years
Correspondence (general)	3 years
<b>Accounting and Corporate Tax Records</b>	
Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
IRS Form 990 Tax Returns	Permanent
General Ledgers	Permanent
Business Expense Records	7 years
IRS Form 1099	Permanent
Journal Entries	7 years
Invoices	7 years

Sales Records	7 years
Petty Cash Vouchers	7 years
Cash Receipts	7 years
Credit Card Receipts	7 years
<b>Bank Records</b>	
Check Registers	7 years
Bank Deposit Slips	7 years
Bank Statement and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years
<b>Payroll and Employment Tax Records</b>	
Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	Indefinitely
W-2 Statements	4 years after termination
<b>Employee Records</b>	
Employment and Termination Agreements	4 years after termination
Retirement and Pension Plan Documents	Permanent
Records Relating to Promotion, Demotion or Discharge	4 years after termination
Accident Reports and Worker's Compensation Records	7 years after settlement
Salary Schedules	4 years after termination
Employment Applications	4 years after termination
I-9 Forms	Longer of 3 years from date of filing or 1 year after termination
Time Cards	7 years
<b>Donor and Grant Records</b>	
Donor Records and Acknowledgment Letters	7 years
Grant Applications and Contracts	Indefinitely
<b>Legal, Insurance, and Safety Records</b>	
Appraisals	Permanent
Copyright Registrations	Permanent
Environmental Studies	Permanent

### Electronic Documents and Records

Electronic documents will be retained as if they were paper documents.

Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed

in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods will be tested on a regular basis.

### **Emergency Planning**

Meals on Wheels’ records will be stored in a safe, secure, and accessible manner. Documents and financial files are backed up regularly in the cloud remotely by IT vendor First Equipment.

### **Document Destruction**

Meals on Wheels’ Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. Document destruction will be suspended immediately upon any indication of an official investigation, or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

### **Compliance**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against Meals on Wheels and its employees and possible disciplinary action against responsible individuals. The Executive Director and Treasurer will periodically review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.

January 28, 2021