

No Veteran Left Behind USA, Inc.
Document Retention & Destruction Policy
(Approved by the Board of Directors)

I. PURPOSE

A. 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 and official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by the No Veteran Left Behind USA, Inc (herein referred to as the "Organization") in connection with the transaction of organization business.

B. The Document Retention & Destruction Policy covers all records and documents, regardless of physical form, as well as contains guidelines for how long certain documents should be kept and how records should be destroyed (unless under a legal hold).

C. This policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate the Organization's operations by promoting efficiency and freeing up valuable storage space.

II. DOCUMENT RETENTION

A. The Center follows the document retention procedures outlined below.

B. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

Corporate Records

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
Charter	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
Accounting and Corporate Tax Records	
Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
IRS Form 990 Tax Returns	Permanent
General Ledgers	7 years/Permanent
Business Expense Records	7 years
IRS Forms 1099	7 years
Journal Entries	7 years
Invoices	7 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

Bank Records

Check Registers	7 years/Permanent
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years

Payroll and Employment Tax Records

Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	7 years
W-2 Statements	7 years

Employee Records

Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Records about Promotion, Demotion, or Discharge	7 years after termination
Accident Reports and Worker's Compensation Records	5 years
Salary Schedules	5 years
Employment Applications	3 years
I-9 Forms	3 years after termination
Timesheets	2 years

Donor and Grant Records

Donor Records and Acknowledgment Letters	7 years
Grant Applications and Contracts	7 years after completion

Legal, Insurance, and Safety Records

Appraisals	Permanent
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Copyright Registrations	Permanent
Environmental Studies	Permanent
Insurance Policies	Permanent
Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent
Leases	6 years after expiration
OSHA Documents	5 years
General Contracts	3 years after termination

Program Records

Women Veterans Health Clinic	3 years
Petticoat and Combat Boots	7 years
Case Study	7 years
LGBT War Memorial	10 years
Color Guard	3 years

III. ELECTRONIC DOCUMENTS AND RECORDS

A. 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 except that any electronic files that are accounting records and are in the Organization’s electronic accounting software shall not be deleted after the appropriate amount of time for the corresponding paper documents but shall instead be kept permanently.

B. 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.

C. Backup and recovery methods will be tested on a regular basis.

IV. EMERGENCY PLANNING 101

A. The Organization’s records will be stored in a safe, secure, and accessible manner.

B. Documents and financial files that are essential to keeping the Organization operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

V. DOCUMENT DESTRUCTION

A. The Board of Directors is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction.

B. Destruction of financial and personnel-related documents will be accomplished by shredding.

C. 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.

VI. COMPLIANCE

A. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Organization and its employees and possible disciplinary action against responsible individuals. The Executive Director and Chair of the Finance Committee 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.

B. Failure to comply with this Document Retention & Destruction Policy may result in punitive action against the employee, including suspension or termination.

Signature _____ Date _____

Name (please print) _____