

## DOCUMENT RETENTION AND DESTRUCTION POLICY

### I. 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, obstructing, or influencing the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States or any bankruptcy proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by AIA Bucks County 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. 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 AIA Austin's operations by promoting efficiency and freeing up valuable storage space.

### II. Document Retention

AIA Bucks County 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.

### III. Corporate Records

|  |           |
|--|-----------|
| Articles of Incorporation                                    | Permanent |
| Executive/Board Committee Minutes                            | Permanent |
| Executive/Board Policies & Resolutions                       | Permanent |
| Bylaws   | Permanent |
| IRS Application for Tax-Exempt Status & Determination Letter | Permanent |
| State Sales Tax Information & Returns                        | 7 years   |
| Chapter Charter  | Permanent |
| General Correspondence                                       | 3 years   |

### IV. Accounting and Corporate Tax Records

|                                     |           |
|-------------------------------------|-----------|
| Financial Statements and any Audits | Permanent |
| General Ledgers                     | Permanent |
| Depreciation Schedules              | Permanent |
| IRS 990 Tax Returns                 | 7 years   |
| Business Expense Records            | 7 years   |
| Invoices                            | 7 years   |
| Sales Records                       | 5 years   |
| Credit Card Receipts                | 3 years   |

### V. Bank Records

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

### VI. Payroll and Employment Tax Records

|                                |           |
|--------------------------------|-----------|
| Payroll Registers              | Permanent |
| State Unemployment Tax Records | 5 years   |
| Earnings Records               | 7 years   |

|                     |         |       |
|---------------------|---------|-------|
| Payroll Tax returns | 7       | years |
| W-2 Statements      | 7 years |       |

**VII. Employee Records**

|   |                           |
|---|---------------------------|
| Employment and Termination Agreements                       | Permanent                 |
| Retirement and Pension Plan Documents if applicable Records | Permanent                 |
| Relating to Promotion, Demotion or Discharge Accident       | 7 years after termination |
| Reports and Worker’s Compensation Records Salary Schedules  | 5 years                   |
| Employment Applications                                     | 5 years                   |
| I-9 Forms   | 3 years                   |
|   | 3 years after termination |

**VIII. Legal, Insurance and Safety Records**

|                    |                           |
|--------------------|---------------------------|
| Insurance Policies | Permanent                 |
| Leases             | 6 years after expiration  |
| General Contracts  | 7 years after termination |

**IX. 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 email message, the message should be printed in hard copy and kept in the appropriate file or moved into an “archive” computer file folder. Backup and recovery methods will be tested on a regular basis but no less than annually. In the event AIA Bucks County has a voicemail system that allows the user to store and archive voicemail messages electronically with other electronic records of the organization, then if the user has sufficient reasons to keep a voicemail message, the message should be retained electronically with those files that relate to the subject matter of the voicemail and shall be disposed of in accordance with the schedule for “General Correspondence” described above. In the event AIA Bucks County does not have the capability to store electronically the voicemail messages, the user will reduce the message to writing and file it in any physical files that relate to the subject of the voice mail. The writing will be treated as “General Correspondence” and disposed of in accordance with the schedule above.

**X. Document Destruction**

The AIA Bucks County 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.

**XI. Compliance**

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

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*\*A record or document is essentially any material that contains information about AIA Bucks County plans, results, policies or performance. In other words, anything about this organization that can be represented with words or numbers can be considered a business record.*