

## **Harlem Academy Records Retention Policy**

(Adopted by the Board of Trustees on October 10, 2012)

### **Policy Statement**

This memorandum sets forth the policies and procedures for the management of Documents (as defined below) created, used or stored by or on behalf of Harlem Academy (the "School"). It is based upon applicable legal and operational requirements.

This Document Retention Policy applies to all departments of the School, and to all School trustees, employees, interns and other volunteers who create, use, or store the School's records. It also applies to any contractors, consultants, vendors and other third parties involved in the creation, use, or storage of any paper and electronic records that belong to the School.

### **Objective**

The objective of this Document Retention Policy is to establish a consistent policy for managing, retaining, storing and disposing of Documents, regardless of the media in which they are created, in order to:

- A. ensure the preservation of Documents relevant to any pending, threatened, reasonably foreseeable or contemplated legal action or proceeding or government investigation;
- B. ensure that Documents required for the School's operations are maintained in an efficient manner so they can be readily accessed when necessary;
- C. comply with applicable legal requirements for retaining Documents;
- D. reduce the volume and cost of storing Documents that are no longer needed by the School; and
- E. ensure an appropriate and orderly Document disposal process.

### **Policy**

The general policy of the School is to retain for an appropriate time all Documents that are needed to operate the School or required by law to be retained. Documents should be retained or routinely disposed of in accordance with the time periods indicated in the Document Retention Schedule, attached as Exhibit A. These time periods apply to all Documents regardless of how or where they are maintained.

"Document" means any document, communication, memorandum, report, record, data compilation or other similar item generated, received, transmitted or maintained by (i) the School, or (ii) any of the School employees for or on behalf of the School (including informational, working and personal copies), regardless of the format or storage method of or medium used to store the item, including any paper, chart, card, book, photograph, microfilm, microfiche, magnetic media, daytimer, electronic calendar, computer tape, floppy disk, zip drive, computer hard drive, e-mail, electronic image or CD-ROM, and any copy, back-up or printout thereof.

Paper documents should be stored in a safe, secure, and accessible manner, either onsite or a contracted storage facility offsite. Electronic documents will be retained as electronically, with appropriate backup and recovery methods.

Any documents relevant to impending or ongoing litigation, government investigation, or audit must be retained until such matters have been resolved, all appeals are exhausted, and the retention period has expired. Destruction of relevant documents must cease, including the destruction of documents according to approved retention periods, when such a document hold is in place. All notifications to employees regarding document holds (suspension and reinstatement) will be issued by the Head of School.

Each department is responsible for the on-going compliance with the policy and will conduct an annual review of all Documents maintained in or by employees of the Department. The results of annual reviews will be documented and provided to the Finance Director. If a Department is uncertain whether a particular Document should be retained or disposed of per Exhibit A, he or she should seek advice from the Head of School who will make the final determination.

To the extent original versions of Documents to be retained are available, only the originals will be retained. Copies should not be retained. If an original is not available, only one copy will be retained. Only the most recent draft of a Document should be retained. Once a draft has been superseded by a new draft, the old draft should be disposed appropriately.

Documents must not be retained beyond their retention periods as defined in Exhibit A unless valid business reasons for their continued retention are provided or they are the subject of a document hold. Destruction of records pursuant to this policy should occur regardless of the medium in or on which records appear or their location. As a general rule, records should be destroyed if:

- They have outlived their retention period per Exhibit A, **and**
- Continued preservation is not required per a current document hold.

School Documents should be reviewed for retention no less than annually.

The standard methods of destruction are by recycling (as long as not confidential), or by shredding. Destruction of records may occur on-site or through an outside vendor who has provided written assurance of confidentiality. All destruction of records should be conducted in a secure and confidential manner. Electronic Documents will be disposed of by the information technology department.

## **Policy Revisions**

Each Department is also responsible for ensuring the review and revision, if applicable, of its Document Retention Schedule. Periodically, it may be required that new categories of records be added or that categories that are no longer applicable be removed. It is recommended that each Department review its Document Retention Schedule every three years for accuracy.

## Exhibit A

<b>Organization Records</b>	
Annual Reports	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
IRS Application for Tax-Exempt Status	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Training manuals & handbooks	Permanent
Long-Term Strategic Plans	Permanent
Capital Construction Project File	7 years after project completion

<b>Finance &amp; Accounting Records</b>	
Petty Cash Vouchers	3 years
Budget	3 years
Sales Records	5 years
Cash Receipts	7 years
Invoices (to customers, from vendors)	7 years
Journal Entries	7 years
Business Expense Records	7 years
Credit Card Receipts	7 years
IRS Forms 1099/1096	7 years
Bank Statements and Reconciliations	7 years
Bank Deposit Slips	7 years
Check Registers	7 years
Check Disbursements	7 years
Financial statements (interim/internal)	7 years
State/Federal Reimbursement Claims	7 years
Fixed Asset & Depreciation Records	Permanent
IRS Form 990 Tax Returns	Permanent
General Ledgers	Permanent
Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
Deeds, mortgages and bills of sales	Permanent

<b><i>Employee Records</i></b>	
Time Cards	3 years
Worker's Compensation/Disability Records	5 years
Personnel Records	7 years after termination
Employment Contracts	7 years after termination
State and Federal Employment Forms	7 years after termination
Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent

<b><i>Payroll and Employment Tax Records</i></b>	
Payroll Tax Returns	7 years
Earnings Records	7 years
Garnishment Records	7 years
W-2 Statements	7 years
Payroll Registers	7 years
State Unemployment Tax Records	7 years

<b><i>Legal, Insurance, and Safety Records</i></b>	
Insurance Policies occurrence based	3 years after expiration of coverage period
Insurance Policies – claims made	Permanent
Contracts (including real estate leases)	7 years after termination/expiration
Audits – Other (Policies, Projects, Public Funding, etc)	7 years
Real Estate Documents	Permanent
Claims and litigation files	Permanent
Correspondence (legal and important matters)	Permanent
Emergency Response Plans	Permanent

<b><i>Student Records (Period effective date is date of graduation or student withdrawal)</i></b>	
Admission Applications – Non-enrolled Students	1 Year
Student Test Records	1 year
Health Files	2 years
Financial Aid Files	5 years
Basic Educational Data System (BEDS) records	5 years
Transcripts	Permanent
Academic Records	Permanent
Attendance Records	Permanent

<b><i>Food Management &amp; Child Nutrition</i></b>	
Program Records (Lunch applications, rosters, etc)	3 years
Inspection Reports	3 years
Program Participation Agreement	7 years

<b><i>Development &amp; Communications Records</i></b>	
Grant Applications – Non-awarded	3 years
Donor Records/Acknowledgment Letters (excluding Master File)	7 years
Grant Applications and Contracts	7 years after completion
Images (Pictures, Logos, etc)	Permanent
Publications	Permanent
Fund/Trust Agreements and Statements	Permanent
Master Summary File of Donor Gifts/Grants	Permanent