Nashua River Watershed Association

“DOCUMENT RETENTION AND DESTRUCTION POLICY”

1. Purpose

In accordance with the Sarbanes-Oxley Act, this policy provides for the systematic review, retention, and destruction of documents received or created by the Nashua River Watershed Association (NRWA) in connection with the transaction of the Association’s business. This policy covers the retention of all records and documents and also covers how records and documents should be destroyed. The policy is designed to ensure compliance with all applicable federal and state laws and regulations.

The NRWA Board of Directors adopted this Document Retention and Destruction Policy on June 24, 2009.

2. Document Retention

The NRWA 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.

3. Corporate Records

Annual Reports to Secretary of State/Attorney General
Articles of Incorporation
Board Meeting and Board Committee Minutes
Board Policies/Resolutions
By-laws
Construction Documents
Fixed Asset Records
IRS Application for Tax-Exempt Status (Form 1023)
IRS Determination Letter
State Sales Tax Exemption Letter
Contracts (after expiration)

Permanent
Accounting and Corporate Tax Records
Annual Executives and Financial Statements  Permanent
Depreciation Schedules  Permanent
General Ledgers  Permanent
IRS 990 Tax Returns  Permanent
Business Expense Records  7 years
IRS 1099s  7 years
Journal Entries  Permanent
Invoices  7 years
Sales Records (box office, concessions, gift shop)  7 years
Petty Cash Vouchers  7 years
Cash Receipts  7 years
Credit Card Receipts  7 years

Bank Records
Check Registers  Permanent
Bank Deposit Slips  3 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  Permanent

Employee Records
Employment and Termination Agreements  Permanent
Retirement and Pension Plan Documents  Permanent
Records Relating to Promotion, Demotion or Discharge  7 years after termination
Accident Reports and Worker’s Compensation Records  7 years
Salary Schedules  8 years
Employment Applications  3 year
I-9 Forms  3 years after termination
Time Cards  7 years

Fundraising Records
Donor Records and Acknowledgement Letters  7 years
Grant Applications and Contracts  5 years after completion
Government Grants & Contracts  Permanent

Approved June 24, 2009
Legal, Insurance and Safety Records

Appraisals
Insurance Appraisals
Copyright Registrations
Environmental Studies
Insurance Policies
Real Estate Documents
Stock and Bond Records
Trademark Registrations
Leases
OSHA Documents
General Contracts

Permanent
6 years
Permanent
Permanent
Permanent
Permanent
Permanent
10 years after expiration
5 years
3 years after termination

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

5. Emergency Planning

The NRWA’s records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the NRWA operating in an emergency will be duplicated or backed up at least every week and maintained off site.

6. Document Destruction

The NRWA’s Director of Finance (or Executive Director, if there is no Director of Finance) is responsible for the ongoing process of identifying its records, noting their 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.

7. Compliance

All documents created subsequent to the adoption of this Policy by the NRWA Board of Directors will be handled in strict according with the Policy. Concurrently, the Association will begin a systematic review of its existing documents with the intent of complying as fully as possible with each aspect of the Policy.

Approved June 24, 2009
Failure on the part of employees to follow this policy to the extent possible can result in possible civil and criminal sanctions against the NRWA and its employees. The Director of Finance or Executive Director and the Executive Committee Chair will periodically review these procedures with the organization’s certified public accountant or auditor to ensure that they are in compliance with new or revised regulations.

*Note: Files in boxes need to be labeled with contents and destruction date on the outside.*

Approved June 24, 2009