

# **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 or obstructing any official proceeding, this policy provides for the systematic review, retention and destruction of documents received or created by the North Carolina Preservation Consortium in connection with the transaction of the organization's 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
- Specifies the position of the person(s) charged with overseeing that the policy is enforced

#### II. Document Retention

The North Carolina Preservation Consortium 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.

Corporate Records	Minimum Requirement
Annual reports	Permanent
Articles of Incorporation	Permanent
Board meeting and committee minutes	Permanent
Board member rosters (by fiscal year)	Permanent
By-laws (copy of each approved change	Permanent
Budget, fiscal year-end	Permanent
Contracts (after expiration)	5 years
Correspondence, general	3 years
Correspondence, legal and important matters	Permanent
IRS application for tax-exempt status	Permanent
IRS determination letter (tax exempt status)	Permanent
Membership lists (print out list at end of FY)	Permanent
Other corporate and operational policies	Permanent
Programs	
Conference agendas and materials	Permanent
Endangered Artifacts, Approved	Permanent
Endangered Artifacts, Not Approved	3 years



Preservation Excellence Award, awarded	Permanent
Preservation Excellence Award, not awarded	
,	3 years Permanent
Preservation Grants applications, awarded	
Preservation Grants applications, not awarded	3 years
Disaster Relief Grant applications, awarded	Permanent
Disaster Relief Grant applications, not awarded	3 years
Workshop announcements/descriptions	Permanent
Publications (newsletters, rack cards, advertisements,	Permanent
flyers, post cards, etc.; keep one example)	
Scholarships awarded	3 years
Strategic plans	Permanent
Accounting and Corporate Tax Records	Minimum Requirement
Annual audits and financial statements	Permanent
Business expense records	7 years
Fixed assets and depreciation schedules	Permanent
General ledgers and journal entries	7 years
IRS 990 tax returns (including 990-N e-postcard)	Permanent
IRS 1099s	7 years
Invoices (submitted to NCPC)	7 years
Invoices (submitted to NCPC)  Invoices (sent from NCPC)	7 years
Membership Applications (paid), Individuals	3 years
Membership Invoices (paid), Institutional	3 years
N.C. Solicitation License Exemption applications	Permanent
Petty cash vouchers, cash and credit card receipts	3 years
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Registrations, Conference	3 years
Registrations, Workshops	3 years
Sales records (service fees and receipts)	5 years
Personnel and Payroll Records	Minimum Requirement
Payroll records	Permanent
Payroll tax returns	7 years
State unemployment tax records	Permanent
W-2 statements	7 years
I-9 Forms	3 years after termination,
W-4 Forms	4 years
Timesheets	5 years
Personnel files (current employees)	4 years after termination
Personnel files (terminated employees)	7 years
Recruitment/Hiring Records	1 year
Employment applications for individuals not hired	3 years
Employment applications for marriadus not infed	5 years



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Retirement and pension records	Permanent
Records Relating to Promotion, Demotion or Discharge	7 years after termination
Equal Pay (wage rates, job evaluations, seniority and	5 years
merit systems, and collective bargaining agreements)	
that explain basis for paying different wages to employees	,
of opposite sexes (or differing gender) in same	
establishment	
Accident reports/Workers comp records	5 years
Medical records if they pertain to FMLA or HIPAA	6 years
Bank Records	Minimum Requirement
Bank deposit slips	7 years
Bank statements and reconciliation	7 years
Checks for important payments and purchases	Permanent
Check registers	7 years
Electronic fund transfer documents (includes	7 years
AmazonSmile; First Giving; Paypal)	
Donations and Grant Records	Minimum Requirement
Donor records and acknowledgement letters (donors to NCPC)	7 years
Grant applications and supporting paperwork for	5 years after completion of
grants submitted by NCPC, if successful	project
Grant applications submitted by NCPC, if declined	1 year after submission
Logal Ingurance and Cafaty Decords	Minimum Doquinomont
Legal, Insurance and Safety Records	Minimum Requirement Permanent
Appraisals  Conflict of interest deguments	
Conflict of interest documents	5 years
Copyright registrations	Permanent
Insurance policies	Permanent
General contracts	7 years after termination
Leases	6 years after expiration
OSHA documents	5 years
Real estate documents	Permanent
Stock and bond records	Permanent
Trademark registrations	Permanent
Whistleblower compliance records	5 years



#### III. 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 to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

## **IV. Emergency Planning**

The North Carolina Preservation Consortium's records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the North Carolina Preservation Consortium operating in an emergency will be duplicated or backed up regularly.

#### V. Document Destruction

The North Carolina Preservation Consortium's Executive Director is responsible for the ongoing process of identifying its records that have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. If the Executive Director is not able to carry out this responsibility, the President and Secretary will do so.

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

Failure on the part of employees, staff, volunteers, or members of the North Carolina Preservation Consortium Board of Directors to follow this policy can result in possible civil and criminal sanctions against North Carolina Preservation Consortium and possible disciplinary action against responsible individuals. The Executive Director and the Finance Committee Chair will periodically review these procedures to ensure that they are in compliance with new or revised regulations.

Submitted to the NCPC Board of Directors on May 19, 2017. Approved by the NCPC Board of Directors on May 19, 2017.



Updated February 9, 2018 (approved). [removed workshop/conference handouts; removed Sales Tax Exemption letter]

*Updated February 12, 2022 [added employment documentation; added disaster grant]* [added/amended items in italics]

### Notes:

The Duke University Archivist helped a great deal in developing this document. In consultation with the Duke University Archivist:

- We do not need to keep registration information beyond what we need for business purposes. These are now listed with a three-year retention.
- We do not need to keep handouts from conferences, only keep agendas, speaker information, etc.