



# RECORD RETENTION AND DESTRUCTION POLICY

## STATEMENT OF POLICY

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 the operation of the Colorado Nonprofit Association (“Association”) by promoting efficiency and freeing up valuable storage space.

## RETENTION SCHEDULE AND ADMINISTRATION

The Association’s Record Retention Schedule is set forth in Appendix A. The Director of Finance & Operations (“Administrator”) shall administer this Policy. The Administrator is also authorized to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories for the Association; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this policy.

## ELECTRONIC DOCUMENTS AND RECORDS

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types in Appendix A will be maintained for the appropriate amount of time. If an employee 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.

## SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

No director, officer, employee, volunteer or agent of the Association shall destroy, dispose of, conceal, or alter any record or document while knowing that it is or may be relevant to an anticipated or ongoing investigation or legal proceeding conducted by or before a federal, state

or local government agency, including tax and regulatory agencies, law enforcement agencies, and civil and criminal courts, or an anticipated or ongoing internal investigation, audit or review conducted by the Association.

During the occurrence of an anticipated or ongoing investigation or legal proceeding as set forth above, the Administrator shall suspend any further disposal of documents until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as necessary to promptly inform all staff of any suspension in the further disposal of documents.

This Policy was approved by the Executive Committee of Colorado Nonprofit Association on December 17, 2009.

## APPENDIX A – RECORD RETENTION SCHEDULE

### **A. Accounting and Finance**

<b>Record Type</b>	<b>Retention Period</b>
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Bank Statements and Canceled Checks	7 years
Expense Records	7 years
General Ledgers	Permanent
Electronic Payment Records	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment

### **B. Corporate Records**

<b>Record Type</b>	<b>Retention Period</b>
Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
By-laws	Permanent
Board Meeting and Board Committee	Permanent

Minutes	Permanent
Board Policies/Resolutions	Permanent
IRS Application for Tax-exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	7 years
Contracts (after expiration)	Permanent
Licenses and Permits	

## C. Employee Documents

<b>Record Type</b>	<b>Retention Period</b>
Benefit Plans	Permanent
Employee Files	Termination + 7 years
Employment applications, resumes and other forms of job inquiries, ads or notices for job opportunities	3 years
Forms I-9	3 years after hiring, or 1 year after separation
Employment Taxes	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	5 years
Unclaimed Wage Records	6 years
Retirement and Pension Records	Permanent

## D. Property Records

<b>Record Type</b>	<b>Retention Period</b>
Lease Agreement	Permanent

Property Insurance Policies

Permanent

## E. Tax Records

### Record Type

### Retention Period

Tax-Exemption Documents  
and Related Correspondence

Permanent

IRS 990 and 990T tax returns

Permanent

Tax Bills, Receipts, Statements

7 years

Tax Workpaper Packages - Originals

7 years

Sales/Use Tax Records

4 years

## F. Grant Records

### Record Type

### Retention Period

Original grant proposal

7 years after completion of grant  
period

Grant agreement and subsequent  
modifications, if applicable

7 years after completion of grant  
period

All requested IRS/grantee correspondence  
including determination letters and “no  
change” in exempt status letters

7 years after completion of grant  
period

Final grantee reports, both financial and  
narrative

7 years after completion of grant  
period

All evidence of returned grant funds

7 years after completion of grant  
period

All pertinent formal correspondence  
including opinion letters of counsel

7 years after completion of grant  
period

Report assessment forms

7 years after completion of grant  
period

Documentation relating to grantee  
evidence of invoices and matching or  
challenge grants that would support  
grantee compliance with the grant  
agreement

7 years after completion of grant  
period

**Record Type**

Pre-grant inquiry forms and other documentation for expenditure responsibility grants

Grantee work product produced with the grant funds

**Retention Period**

7 years after completion of grant period

7 years after completion of grant period

**G. Contribution Records****Record Type**

Records of Contributions

The Association's or other documents evidencing terms of gifts

**Retention Period**

Permanent

Permanent

**H. Program and Service Records****Record Type**

Colorado Nonprofit Association  
conventions

Research & Publications

**Retention Period**

Permanent (1 copy only)

Permanent (1 copy only)