

**National Peace Corps Association
Document Retention and Destruction Policy
Approved 20 June 2016
Policy #2016004G**

Purpose

The purpose of this document retention policy is to establish standards for document integrity, retention, and destruction and to promote the proper treatment of National Peace Corps Association (NPCA) records.

POLICY

Section 1. General Guidelines

Records should not be kept if they are no longer needed for NPCA operations or required by law. Unnecessary records should be eliminated from the files. The cost of maintaining records is an expense which can grow unreasonably if good housekeeping is not performed. A mass of records also makes it more difficult to find pertinent records.

NPCA may establish retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that warrant special consideration are identified below. Although minimum retention periods have been established, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention as well as any exceptions for litigation-relevant documents and any other pertinent factors.

Section 2. Exception for Litigation Relevant Documents

NPCA expects all officers, Board of Directors (Board) directors, and employees to comply fully with any published record retention or destruction policies and schedules, provided that all officers, Board directors, and employees should note the following general exception to any stated destruction schedule: If you believe, or NPCA informs you, that any NPCA records are relevant to litigation, or potential litigation (i.e. a dispute that could result in litigation), then you must preserve those records until it is determined that the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records.

Section 3. Minimum Retention Periods for Specific Categories

- A. Corporate Documents.** Corporate documents include the NPCA Articles of Incorporation, NPCA Bylaws and IRS Form 1023 and Application for Exemption. NPCA corporate documents should be retained permanently. IRS regulations require that Form 1023 be available for public inspection upon request.
- B. Tax Records.** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of contributions made by donors, accounting procedures, and other documents concerning NPCA's revenues. Tax records

should be retained for at least seven years from the date of filing the applicable return.

- C. **Employment Records/Personnel Records.** State and federal statutes require that NPCA keep certain recruitment, employment and personnel information. NPCA shall also keep personnel files that reflect performance reviews and any complaints brought against the corporation or individual employees under applicable state and federal statutes. NPCA shall also keep in the employee's personnel file all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel. Employment applications shall be retained for three years. Retirement and pension records shall be kept permanently. Other employment and personnel records shall be retained for seven years.
- D. **Board and Board Committee Materials.** Meeting minutes shall be retained in perpetuity in the NPCA minutes book. A clean copy of all other NPCA Board and Board committee materials shall be kept for no less than three years.
- E. **Press Releases/Public Filings.** NPCA shall retain permanent copies of all press releases and publicly filed documents under the theory that NPCA should have its own copy to test the accuracy of any document a member of the public can theoretically produce against NPCA.
- F. **Legal Files.** Legal counsel shall be consulted to determine the retention period of particular documents, but legal documents shall be maintained for a period of ten years.
- G. **Marketing and Sales Documents.** NPCA shall keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally three years. An exception to the three-year policy may be sales invoices, contracts, leases, licenses, and other legal documentation. These documents shall be kept for at least three years beyond the life of the agreement.
- H. **Development/Intellectual Property and Trade Secrets.** Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to NPCA and are protected as a trade secret where NPCA:
 - 1. Derives independent economic value from the secrecy of the information; and
 - 2. Has taken affirmative steps to keep the information confidential.

NPCA shall keep all documents designated as containing trade secret information for at least the life of the trade secret.

- I. **Contracts.** Final, execution copies of all contracts entered into by NPCA should be retained. NPCA shall retain copies of the final contracts for at least three years beyond the life of the agreement, and longer in the case of publicly filed contracts.
- J. **Correspondence.** Unless correspondence falls under another category listed elsewhere in this policy, correspondence shall be saved for two years.
- K. **Banking and Accounting.** Accounts payable ledgers and schedules shall be kept for seven years. Bank reconciliations, bank statements, deposit slips and checks (unless for important payments and purchases) shall be kept for three years. Any inventories of products, materials, and supplies and any invoices shall be kept for seven years.

- L. **Insurance**. Expired insurance policies, insurance records, accident reports, claims, etc. shall be kept permanently.
- M. **Audit Records**. External audit reports should be kept permanently. Internal audit reports shall be kept for three years.

Section 4. Electronic Mail. Email that needs to be saved shall be either:

- A. Printed in hard copy and kept in the appropriate file; or
- B. Downloaded to a computer file and kept electronically or on disk as a separate file. The retention period depends upon the subject matter of the e-mail, as covered elsewhere in this policy.