

# Records Retention Policy

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Effective Date: 9/25/2013; Revised Date:

## POLICY

St. Anne's will fully and accurately maintain all agency-related records, data and information.

## PURPOSE

The purpose of this policy is to ensure the agency complies with all applicable federal, state, local laws, regulations and funder requirements concerning records retention and destruction.

## PROCEDURE

Records, data and information are considered agency assets and are to be valued and managed accordingly and in compliance with all applicable laws and regulations. As such, St. Anne's will take the following steps to ensure the complete and accurate management and maintenance of agency records, data and information:

1. Records and documents will include paper, electronic files (including e-mail) and voicemail records, regardless of where the document is stored, including network servers, desktops or laptop computers and handheld computers and other wireless devices with text messaging capabilities.
2. All Employees will be responsible for the proper creation, management and storage of agency records and information.
3. Each year, St. Anne's will review retained records for determination of retention and disposal requirements.
  - a. St. Anne's Senior Management Team, Directors and Department Heads will conduct this review of records in their possession in accordance with the established schedule.
  - b. A list of records proposed to be subject to destruction will be presented to the President and CEO or his/her designee, and disposed of as instructed.
4. Records and information are confidential and proprietary property or assets of the agency and may be made available outside the agency only with the appropriate authorization and after consideration of the interests of the agency and the young women and children served.
5. All agency records will be retained in accordance with St. Anne's Records Retention Schedule (see below) and subject to all applicable laws and regulations.
6. All Employees will comply with the retention periods set forth in St. Anne's Records Retention Schedule.
7. All records will be destroyed upon the conclusion of their retention period.
8. Records identified as subject to threatened of actual litigation, subpoena, an audit or a government investigation will be suspended from destruction and held.

All records suspended will not be destroyed until they are released by written notification of the President and CEO.

**St. Anne's Records Retentions Schedule**

Type of Record	Description	Examples	Retention Period
Contracts (still in effect)	<i>Records documenting legal obligations between St. Anne's and other parties that have <u>not</u> expired</i>	<ul style="list-style-type: none"> <li>• Unexpired Vendor Agreement</li> <li>• Unexpired Confidentiality Agreement</li> <li>• Unexpired Services Agreement</li> </ul>	Date of Expiration + 7
Contracts (no longer in effect)	<i>Records documenting legal obligations between St. Anne's and other parties that have expired.</i>	<ul style="list-style-type: none"> <li>• Expired Vendor Agreement</li> <li>• Expired Confidentiality Agreement</li> <li>• Expired Services Agreement</li> </ul>	Current Year (CY) + 7
Corporate Records	<i>Records documenting corporate formation, organization and ongoing corporate management</i>	<ul style="list-style-type: none"> <li>• Articles of Incorporation</li> <li>• Bylaws</li> <li>• Board of Directors and Board committee minutes</li> <li>• Corporate Policies</li> <li>• State qualifications to do business</li> <li>• Annual reports to state governments</li> </ul>	Permanent Record (PR)
Correspondence (general)	<i>Correspondence not otherwise covered by a specific type of record in this schedule</i>	<ul style="list-style-type: none"> <li>• Correspondence with Vendors</li> <li>• Correspondence with outside individuals or agencies</li> </ul>	CY + 3
Deeds, Mortgages and Bills of Sale	<i>Documents evidencing ownership in real estate or personal property and documents evidencing loans on such assets</i>	<ul style="list-style-type: none"> <li>• Real Estate Deeds</li> <li>• Mortgage documents</li> <li>• Cancelled Checks for large purchases of property</li> </ul>	PR
Donations	<i>Records relating to donations to St. Anne's</i>	<ul style="list-style-type: none"> <li>• Letters accompanying donations</li> <li>• Solicitation letters</li> <li>• Gift Agreements</li> <li>• Wire transfer records</li> </ul>	PR

Type of Record	Description	Examples	Retention Period
		<ul style="list-style-type: none"> <li>and cancelled checks evidencing donations</li> <li>• Acknowledgment Letters</li> </ul>	
Financial Records	<i>Records relating to the finance and accounting functions of St. Anne's</i>	<ul style="list-style-type: none"> <li>• Bank Statements</li> <li>• Cancelled Checks (other than for payments for large purchases of property)</li> </ul>	CY + 10
Government Audit Documents	<i>Findings and observations from a government audit of St. Anne's, and information gathered during audit process</i>	<ul style="list-style-type: none"> <li>• Audit findings</li> <li>• Corrective actions</li> <li>• Final Audit Report</li> <li>• Audit work papers</li> </ul>	Audit (A) + 10
Health Care Records	<i>Records related to the provision of health care, including hospital records</i>	<ul style="list-style-type: none"> <li>• Medical examinations</li> <li>• Birth documentation</li> <li>• Hospital documents</li> </ul>	CY + 7
Insurance	<i>Records related to insurance policies</i>	<ul style="list-style-type: none"> <li>• Insurance Policies</li> <li>• Claims made</li> </ul>	CY + 7 Declaration Statement: PR
Payroll	<i>Records related to payroll</i>	<ul style="list-style-type: none"> <li>• Payroll reports and summaries</li> <li>• Time sheets</li> </ul>	CY + 7
Personnel Records (current employees)	<i>Records related to St. Anne's staff</i>	<ul style="list-style-type: none"> <li>• Personnel files</li> <li>• Employment Applications</li> <li>• I-9s</li> </ul>	On-going
Personnel Records (terminated employees)	<i>Records related to terminated employees</i>	<ul style="list-style-type: none"> <li>• Personnel files</li> <li>• Employment Applications</li> <li>• I-9s</li> </ul>	Termination + 7
Retirement and Pension Records	<i>Documents related to retirement and pension plans</i>	<ul style="list-style-type: none"> <li>• Summary plan descriptions</li> <li>• Plan agreements</li> </ul>	PR
Supporting Tax Documents	<i>Documents supporting tax planning, tax appeals or tax return preparation</i>	<ul style="list-style-type: none"> <li>• Appeals work papers</li> <li>• Provision work papers</li> <li>• Tax or information return work papers</li> </ul>	PR
Tax and Information	<i>Tax returns, information returns and</i>	<ul style="list-style-type: none"> <li>• IRS Form 990 and state equivalents</li> </ul>	PR

Type of Record	Description	Examples	Retention Period
Returns	<i>other filings with tax jurisdictions</i>	<ul style="list-style-type: none"> <li>• Correspondence with IRS or state equivalents not related to an audit</li> <li>• AG Form RRF-1</li> </ul>	
Tax-Exempt Status Documents	<i>Authorization from taxing jurisdictions related to St. Anne's tax exempt status</i>	<ul style="list-style-type: none"> <li>• Federal Application for Exemption and state equivalents</li> <li>• IRS Determination Letter</li> </ul>	PR
Trademark registration and copyrights	<i>Documents related to trademark registration and copyrights</i>	<ul style="list-style-type: none"> <li>• Applications</li> <li>• Correspondence</li> <li>• Approvals</li> </ul>	PR