

Record Retention and Document Destruction Policy | 2010

The Open Arms Therapy (OAT) shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy includes paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities.

An OAT employee shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department agency of the United States . . . or in relation to or contemplation of such matter or case." If an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction. In order to eliminate accidental or innocent destruction, OAT has the following document retention Requirements.

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<i>Document Type</i>	<i>Minimum Requirement</i>
Accounts receivable & payable ledgers & Articles of Incorporation, charter, bylaws, minutes and other incorporation records	Permanently
Audit reports, Financial Statements (year end): general/private ledgers, trial balance, journals	Permanently
Bank Reconciliation	3 years
Bank statements, deposit records, electronic fund transfer documents, & cancelled checks	3 years
Chart of accounts	Permanently
Checks (for important payments & purchases)	Permanently
Contracts (still in effect)	Permanently
Contracts, mortgages, notes and leases (expired)	7 years
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	Permanently
Donations	7 years
EEOC reports	Permanently
Employee demographic info & compensation records* (Davis-Bacon Act, Service Contract Act & Walsh-Healy Public Contracts Act)	3 years
Employment applications* (depending on the # of employees, employers must retain applications & other personnel records relating to hires, rehires, tests, promotions, transfers, demotions, selection for training, layoff, recall, termination or discharge) (Civil Rights Act of 1964, Title VII, ADA, ADEA)	3 years from making the record or taking the personnel action

Expense Analyses/expense distribution schedules	7 years
fund transfer documents, & cancelled checks	
Garnishments	7 years
Grants (funded)	7 years after closure
Grants (un-funded)	1 year
I-9 Forms	3 years after date of hire or 1 year after termination
Insurance records, current accident reports, claims, policies, etc.	Permanently
Internal audit reports	7 years
Inventory records	7 years
Invoices (to customers, from vendors)	7 years
Loan documents and notes	Permanently
OSHA logs* (Records related to medical exams – 30 years after termination)	5 years
Personnel files (terminated employees) (Title VII, ADA, ADEA)	7 years after termination
Purchase orders	7 years
schedules	7 years
Tax returns and worksheets including W-2's	Permanently
Timesheets	7 years
Trademark registrations and copyrights	Permanently
Withholding tax statements* (FICA, FUTA, Federal Income)	7 years

Document Protection

Documents (hardcopy, online or other media) will be stored in a protected environment for the duration of the Document Retention Schedule. *(Implement/Pending)* **Computer backup media will be included.**

Document Destruction

Hardcopy of documents will be destroyed by shredding after they have been retained until the end of the Document Retention Schedule. *(Implement/Pending)* **Online copies will be destroyed by fire or other proven means to destroy such media after they have been retained until the end of the Document Retention Schedule.**

Provision of Documentation for Investigations or Litigation

Documents requested and subpoenaed by legally authorized personnel will be provided within 5 business days. The Board President will authorize provision. No documents will be concealed, altered or destroyed with the intent to obstruct the investigation or litigation.