

**SIENA/FRANCIS HOUSE
RECORD RETENTION AND DESTRUCTION POLICY**

The Siena/Francis House (“SFH”) takes seriously its obligations to preserve information relating to, among other things, corporate records, finance and administration, taxes, Federal, local and state awards, contracts, employees, clients, litigation, audits, and investigations.

The information listed in the retention schedule below is intended as a guideline and may not contain all the records the SFH may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the Executive Director, or his or her designated agent or employee.

From time to time, the Executive Director, or his or her designated agent or employee, may issue a notice, known as a “legal hold,” suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Executive Director, or his or her designated agent or employee.

File Category	Item	Retention Period	
Corporate Records	Bylaws and Articles of Incorporation	Permanent	
	Corporate resolutions	Permanent	
	Board and committee meeting agendas and minutes	Permanent	
	Conflict-of-interest disclosure forms	4 years	
	Code of Conduct Policy	4 years	
Finance and Administration	Financial statements (audited)	7 years	
	Auditor management letters	7 years	
	Payroll records	7 years	
	Check register and checks	7 years	
	Bank deposits and statements	7 years	
	Chart of accounts	7 years	
	General ledgers and journals (includes bank reconciliations)	7 years	
	Investment performance reports	7 years	
	Equipment files and maintenance records	7 years after disposition	
	Contracts and agreements, including Federal, city and state grants	7 years after all obligations end	
	Correspondence — general	3 years	
	Insurance Records	Policies — occurrence type	Permanent
		Policies — claims-made type	Permanent
Accident reports		7 years	
Safety (OSHA) reports		7 years	

	Claims (after settlement)	7 years
	Group disability records	7 years after end of benefits
Client Records	Counseling and Case Management files, notes, and records	7 years
Real Estate	Deeds	Permanent
	Leases (expired)	7 years after all obligations end
	Mortgages, security agreements	7 years after all obligations end
Tax	IRS exemption determination and related correspondence	Permanent
	IRS Form 990s	7 years
	Charitable Organizations Registration Statements (filed with Nebraska Attorney General/Department of State)	7 years
Human Resources	Employee personnel files	Permanent
	Retirement plan benefits (plan descriptions, plan documents)	Permanent
	Employee handbooks	Permanent
	Workers comp claims (after settlement)	7 years
	Employee orientation and training materials	7 years after use ends
	Employment applications	3 years
	IRS Form I-9 (store separate from personnel file)	Greater of 1 year after end of service, or three years
	Withholding tax statements	7 years
	Timecards	3 years
Technology	Software licenses and support agreements	7 years after all obligations end

1. 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 on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail 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.

2. Emergency Planning.

The SFH’s records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the SFH operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

3. Document Destruction.

The Executive Director, or his or her designated agent or employee, is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial, personnel-related documents, client files and records will be accomplished by shredding.

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.

4. Compliance.

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the SFH and its employees and possible disciplinary action against responsible individuals. The Executive Director and Board Chair will periodically review these procedures with legal counsel or the SFH's certified public accountant to ensure that they are in compliance with new or revised regulations.