

December 31, 2008

**DOCUMENT AND ELECTRONIC FILE RETENTION POLICY
AND STANDARD OPERATING PROCEDURES*
FOR
JEWISH UNITED FUND OF METROPOLITAN CHICAGO
JEWISH FEDERATION OF METROPOLITAN CHICAGO
JFMC FACILITIES CORPORATION**

*** Also see “Retention Guideline” which is incorporated herein as Appendix A, and “Offsite Backup Media Storage and Retention Procedure” which is incorporated herein as Appendix B**

1.0 PURPOSE

The purpose of the Standard Operating Procedures for Record Retention (the “SOP”) is to establish a uniform system for identifying, storing, retaining, protecting and disposing of the records of the above named agencies and any operations conducting business under another name (d/b/a) and other controlled entities and supporting organizations.

2.0 OBJECTIVES

The primary objectives of the SOP are to:

- Comply with Federal and State corporate, governmental, and regulatory requirements for document retention;
- Protect confidential and proprietary information by limiting access to such information and preventing unintentional destruction;
- Identify and protect vital records;
- Develop and maintain adequate records to document compliance with relevant laws;
- Reduce costs and burdens of complying with discovery obligations in the context of disputes, litigation and/or government investigations;
- Destroy documents and records, when permissible, in a timely and orderly manner to reduce physical and electronic storage space and costs associated therewith, and limit business risks; and
- Retain and preserve records relevant to legal action until outside legal counsel authorizes their destruction.

3.0 DEFINITION OF TERMS AND SCOPE OF SOP

“Document” or “Record” includes any material, regardless of physical form, that is generated or received in connection with transacting its business or is related to legal obligations, and is retained for any period of time. Documents and records subject to retention or destruction as outlined in this SOP include paper records, and electronic records stored in personal computers (including those "backed-up" or archived elsewhere), on computer or CD/DVD media, electronic tape, microfiche, film or any other medium.

This SOP and the Retention Guidelines attached are applicable to its headquarters and its branch offices. All operations must follow government regulations whenever longer retention periods are required. When government regulations require shorter retention periods, records must be kept in accordance with this SOP.

4.0 ROLES AND RESPONSIBILITIES

- 4.1 The Human Resources (HR) Team: The V.P. Human Resources and/or his/her designee will be responsible for all HR records and will be responsible for both the storing and disposing of paper and electronic records. In addition, V.P. HR and/or his/her designee shall supervise the Central Files department which is responsible to work with and provide assistance to the other teams to store and dispose of **paper** records as may be necessary or practical.
- 4.2 The Accounting/Finance Team: The V.P. Accounting and/or his/her designee will be responsible for all Accounting records and will be responsible for both the storing and disposing of paper and electronic records.
- 4.3 Information Systems and Services (ISS) Team: The V.P. ISS and/or his/her Network Administrator designee will be responsible for all ISS records and will be responsible for both the storing and disposing of paper and electronic records. In addition, the V.P. ISS or his/her designee is responsible to work with and provide assistance to the other teams to store and dispose of **electronic** records as may be necessary or practical.
- 4.4 Campaign Team: the Senior V.P. Campaign and/or his/her designee will be responsible for all Campaign records and will be responsible for both the storing and disposing of paper and electronic records. Note: Campaign also includes Missions and Travel, Events, Women's Division, Young Leadership Division, Community Outreach and Leadership Development, and such other programs as may be supervised by this department from time to time.
- 4.5 Legacies and Endowments (L&E) Team: the Senior V.P. L&E and/or his/her designee will be responsible for all L&E records and will be responsible for both the storing and disposing of paper and electronic records. Note: L&E also includes Jewish Women's Foundation, Donor Advised Funds (DAFs), Support Foundations (SFs), Chicago Jewish Genetic Disorders (CJGD), and such other programs as may be supervised by this department from time to time.
- 4.6 The Planning and Allocations (P&A) Team: the Executive V.P. P&A and/or his/her designee will be responsible for all P&A records and will be responsible for both the storing and disposing of paper and electronic records. Note: P&A also includes Grants, Israel Office, Chicago Community Israel Programs (CCIP) and such other programs as may be supervised by this department from time to time.
- 4.7 The Jewish Community Relations Council (JCRC) and Government Affairs (GAO) Team: The Senior VP JCRC – GAO and/or his/her designee will be responsible for all JCRC and GAO records and will be responsible for both the storing and disposing of paper and electronic records.
- 4.8 The Communications Team: The Executive V.P. Communication and/or his/her designee will be responsible for all Communications records and will be responsible for both the storing and disposing of paper and electronic records. Note: Communications also includes Graphics, JUF News, Marketing and such other programs as may be supervised by this department from time to time.
- 4.9 Responsible Individuals: the above individuals and/or their designees are each responsible for identifying the documents from their respective areas that are to be maintained and/or destroyed, and for ensuring that the documents are and filed accordingly.

- 4.10 The Compliance Officer with respect to all matters related to this Document and Electronic File Retention policy is the Executive V.P. - CFO.

5.0 RECORD RETENTION REQUIREMENTS

5.1 Computer File Retention and Destruction

All staff are encouraged to keep their work and files on shared drives (*e.g.*, the N drive, or specific departmental network shared drives) so as to ensure proper backup; the hard (or C:) drive should be used only when traveling or when access to shared drives is not possible.

Computer files (excluding electronic or “e-” mail, which is referred to separately below) are to be treated the same as paper records with respect to the time frame for which they should be kept, and then discarded/destroyed.

Files regarding matters that are completed, closed or inactive should be completely transferred (*i.e.*, not merely copied) to a removable storage medium such as compact discs, diskettes or tape and transferred to the V.P. ISS or his/her designated Network Administrator, who will, in turn be responsible for archiving or destroying and documenting the destruction of such files. Each Responsible Individual (as described in section 4 above) is responsible for maintaining, storing and destroying the files for their respective areas. The V.P. HR - Central Files area or the V.P. ISS - Network Administrator is responsible for any completed, closed or inactive files that have been transferred to them to be placed in an offsite storage or removable storage medium.

5.2 Email File Retention

The ISS Department backs up its email service fully on a nightly basis, and maintains a monthly continuously recycled rotation of the full e-mail backups.

All staff are required to review their e-mail folders and inbox on a regular basis and to delete all non-essential e-mails. Staff is urged to delete emails from their *Deleted Items* and *Sent* items folders at least once per week, or more often if possible. The V.P. ISS and/or Network Administrator, will provide a system, with appropriate software and hardware, to archive old e-mails if staff believes such emails must be retained.

Archives will be provided as necessary, with a maximum limit / or capacity as the Network Administrator may determine to be technically and economically feasible to maintain, after which no more e-mails may be able to be archived, and archived e-mails may have to be deleted or stored in order to make space for new e-mails.

5.3 Program-Related Documents

Each Department head or designated staff of the Department shall review their program files for programmatic documents that must be kept in accordance with

the document retention terms of the primary donor or funder or pursuant to local government regulations. Such files include documents pertaining to the goals and objectives of the program; narrative reports; study and research data and other documents that provide historic or archival records for a program.

5.4 Documents Pertaining to Investigations

All documents (including emails) pertaining to any sort of investigations must be retained until the investigation is completed. Such documents include records examined, reports and legal documents generated as a result of the investigation. If legal action results from the investigation, documents must be retained until legal action has been resolved and until outside legal counsel has authorized destruction.

5.5 Accounting Records

All accounting records, including all vouchers with supporting documentation, shall be retained for seven (7) years beyond the date the organization tax returns are filed.

6.0 DOCUMENTS PERTAINING TO ACTIVE OR THREATENED LITIGATION

The commencement of a lawsuit, or of an internal investigation, or by the government, or the serving of a subpoena or search warrant, or the commencement of an informal inquiry shall suspend operation of this SOP in connection with the destruction of any records relating to the subject matter at issue, until such time as outside counsel advises management that record retention procedures are once again in operation.

7.0 SPECIFIC RETENTION GUIDELINES

As a result of the volume of files maintained, an exhaustive list setting forth the retention period for each individual document is not practical. For this reason, this SOP includes the attached Retention Guidelines setting forth the minimum required retention period for documents falling in specified subject areas, and the individual responsible for maintaining the documents noted. If a document is determined to fit into more than one category, it should be retained for the longest period that applies to such document.

8.0 REMOTE LOCATION RETENTION GUIDELINES

Remote locations will follow the same guidelines outlined in this SOP unless local laws dictate that appropriate documentation is maintained for longer retention periods. A copy of each remote location's retention plans, if different than this plan, are to be kept on file at the headquarter office and updated annually.

9.0 ADMINISTRATION OF SOPs FOR RECORD RETENTION

9.1 Custodian of Records

It is the responsibility of each Responsible Individual as set forth in section 4 to ensure official records are identified, located, maintained and disposed of in keeping with this SOP.

9.2 Period of Retention

The period of retention begins on the date as indicated in the section “Retention Guidelines.”

9.3 Documentation of Destruction of Records

A general list of documents destroyed (indicating details, such as “Documents dated XX through YY) must be maintained by staff for all records destroyed including computer and paper records.

9.4 Method of Destruction – On-Site

On-site destruction may include disposal practices that are reasonable and appropriate to prevent unauthorized access or use of the information, including shredding paper documents and destroying or erasing electronic files so that the information cannot be read or reconstructed.

9.5 Method of Destruction – Off-Site

Off-site records may include disposal practices that are reasonable and appropriate to prevent unauthorized access or use of the information, including shredding paper documents and destroying or erasing electronic files so that the information cannot be read or reconstructed.

9.6 Destruction Schedule

The destruction schedule for email records is outlined in Paragraph 5.2 of Appendix A attached, “Retention Guidelines.” The destruction of all other records is to be conducted on the first day of July for calendar year operations and the first day of January for fiscal year operations for records that have expired during the previous calendar/fiscal year in accordance with the “Retention Guidelines.”

APPENDIX A: RETENTION GUIDELINES

1. General Corporate Records¹

Records in this area include records relating to corporate formation and governance and other documents establishing all rights and obligations.

RECORD TYPE ⁽¹⁾	RETENTION PERIOD	RESPONSIBLE INDIVIDUAL	ONSITE	OFFSITE
Records of incorporation or formation, by-laws and amendments	Permanent	VP Accounting	Permanent	
Qualifications to do business in other states and related records	Permanent	VP Accounting	Permanent	
Name change notifications to states, IRS, and other third parties	Permanent	VP Accounting	Permanent	
Corporate Seal	Permanent	VP Accounting	Permanent	
Evidence of tax exempt status including IRC Section 501 (c)(3) status and Form 990 for each year filed	Permanent	VP Accounting	Permanent	
Charitable registrations	Permanent	VP Accounting	Permanent	
Minute books, Board, committee and shareholder or member meetings	Permanent	VP Human Resources	Permanent	
Annual report	Permanent	EVP Communications	Permanent	
Registrations and Powers of Attorney	Permanent	VP Accounting	Permanent	
Major speeches by corporate officers and directors	As required for historical value	EVP Communications	As deemed appropriate	As deemed appropriate
Agency brochures and pamphlets	As required for historical value	EVP Communications	As deemed appropriate	As deemed appropriate
Material of historical value (pictures, publications, news releases, etc.) Spertus Archives	Permanent	EVP Communications	Permanent	Permanent -- Spertus Archives
Litigation Files	7 years after settlement	Compliance Officer	7 years after settlement	
Trademarks/Copyrights	Permanent	VP Accounting	Permanent	

¹ The "Record Type" applies to all organizations including supporting organizations and trusts.

2. Contracts/Awards/Grants

Unless any longer period is required under their respective terms, contracts should normally be retained as set forth below:

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Contracts entered into/awarded to others (e.g.: sub agreements; subcontracts; contracts; amendments; renewals; and all related correspondence and documents)	7 years after termination of donor funding for the contract	VP Accounting	3 years	4 years
Contracts/Agreements/Grants received from other entities as well as related correspondence and documents	7 years after termination of donor funding	Depending on source of grant this could be VP Accounting, EVP P&A, VP L&E, or a combination of them.	3 Years	4 Years
Grant proposals and related materials	7 years after submission of proposal	EVP Planning and Allocations	3 years after submission of proposal	4 years after submission of proposal

3. Human Resources

A. General

See section IV if separate records are kept for FMLA purposes. See section VI regarding records kept for OSHA purposes. Pension documents and supporting employee data must be kept in such manner and for such periods so that it can be establish at all times whether or not any pension is payable to any person and, if so, the amount of such pension.

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Advertisements for job openings,	4 years from date position filled	VP Human Resources	4 years	
Employment applications	4 years from date position filled	VP Human Resources	4 years	
Job descriptions	6 years after outdated	VP Human Resources	2 years	4years

Human Resources – General Continued

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Active employee's personnel records, including application forms, resumes, job offers, hiring letters, performance evaluations, promotions, education records, training records, benefit election forms, demotions, transfers, lay off, job descriptions, termination papers, exit interview records, test results, consumer reports, background checks, etc.	Permanent	VP Human Resources	Permanent	
Retired employee's personnel records, hire date, retirement date, contracts, agreements, benefit election forms and any other records that substantiate benefit entitlements	6 years after retiree's or surviving beneficiary's death	VP Human Resources	As long as retiree or beneficiary is alive	
Terminated employee's personnel records, hire date, retirement date, contracts, agreements, benefit election forms and any other records that substantiate benefit entitlements	10 years after termination	VP Human Resources	10 years after termination	
Individual contracts of employment, confidentiality and non-compete agreements	5 years after termination of employment	VP Human Resources	5 years	
Collective bargaining agreements, if applicable	Permanent	VP Human Resources	Current and 2 prior contracts	Permanent
Accident/Injury Reports	6 years after date of injury/accident	VP Human Resources	3 years	3 years
Most recently filed EEO-1 Employer Information Reports (for employers of 100 or more)	2 years	VP Human Resources	2 years	
INS Employment Eligibility Verification Form 1-9 ²	3 years after termination of employment	VP Human Resources	3 years	
Requests for reasonable accommodation under ADA	6 years after termination of employment	VP Human Resources	6 years	

² Form I-9 records must be accessible **within 3 days** of an official request for production of the documents for inspection; they are not filed with the federal government.

Human Resources – General Continued

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Health and/or welfare benefit plans and summary plan descriptions ³	5 years after superseded or as long as relevant in determining benefits	VP Human Resources	5 years after superseded or as long as relevant in determining benefits	Permanent
Wage and salary surveys, census reports and headcounts	6 years after completed survey	VP Human Resources	3 years	3 years
Education Assistance Files	7 years after tax filing	VP Human Resources	7 years	
Employee Benefit Plans	7 years after tax filing	VP Human Resources	7 years	
Employee Handbook	10 years after superseded	VP Human Resources	3 years	7 years
Affirmative Action Plan	10 years after superseded	VP Human Resources	3 years	7 years
Recruiting Brochures	10 years after superseded	VP Human Resources	3 years	7 years
Biometric Data	3 years after the last interaction with the agency	VP Human Resources	3 years after the last interaction with the Agency	

³ The DOL requires that records reflecting benefits which are or may become due to any employee and employee names, addresses, etc. be kept as long as they may be relevant. ERISA requires that employers keep records sufficient to determine benefits due or to become due each employee.

B. Family Medical Leave Act Records

See also Section VI if records relate to occupational injury or illness -- OSHA requires retention for longer periods.

Under the FMLA regulations employers must keep the following records for at least three years (no particular order or form of records is required) and make them available for inspection, copying and transcription upon request by the Department of Labor:

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Any documents (including written and electronic records) describing employee benefits or employer policies and practices regarding the taking of paid and unpaid leave	3 years	VP Human Resources	3 years	
Notices of leave by employees to employer, all written notices given to employees by employer under FMLA, dates FMLA leave taken. Leave must be designated in records as FMLA leave. If FMLA leave is taken by eligible employees in increments of less than one full day, the hours of the leave	3 years	VP Human Resources	3 years	
Records of disputes between employer and eligible employee regarding designation of leave as FMLA, including any written statement from employer or employee of the reasons for designation and disagreement	3 years	VP Human Resources	3 years	
Records/documents relating to medical certifications, re-certifications or medical histories of employees or employees' family members, created for FMLA, shall be maintained as confidential medical records and if ADA is also applicable, such records shall be maintained in conformance with ADA confidentiality requirements (See Schedule A)	3 years	VP Human Resources	3 years	

4. Safety and Environmental Documents

General principle - must keep all documents relating to employee and public health and safety for such periods as will enable it to demonstrate compliance with an applicable regulation or standard. These standards and regulations are in a state of continual expansion and change and should be checked every six months.

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
OSHA (Occupational Safety and Health Act of 1970) Forms 300 (Log of work-related injuries and illnesses) 301 (Injury and Accident report) 301(A) (Summary of work-related Injuries and Illnesses) Privacy Case List	5 years following end of calendar year covered by Form	VP Human Resources	5 years	
Citations, violation notices	5 years after settlement	Executive Director Facilities Corp	5 years after settlement	
Licenses, permits and applications	5 years after expiration	Depending on nature of License or permit could be: Ex Director Fac Corp, VP Accounting or VP Campaign	5 years after expiration	

5. Accounting & Finance

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
<u>Accounts Payable</u>				
Vendor Invoices	7 years after tax filing	VP Accounting	3 years	4 years
Accounts Payable Journal	7 years after tax filing	VP Accounting	3 years	4 years
Accounts Payable Aging	7 years after tax filing	VP Accounting	3 years	4 years
Cash Disbursement Journal	7 years after tax filing	VP Accounting	3 years	4 years
Bank Statements	7 years after tax filing	VP Accounting	3 years	4 years
Bank Reconciliations	7 years after tax filing	VP Accounting	3 years	4 years
Cancelled Checks	7 years after tax filing	VP Accounting	3 years	4 years
Cancelled Checks – Fixed Assets	7 years after F/A retired or sold	VP Accounting	3 years	7 years after F/A retired or sold
W-9's	Update as necessary by law	VP Accounting	3 years	4 years
<u>Accounts Receivable</u>				
Customer Agreements	7 years after tax filing	VP Accounting	3 years	4 years
Customer Invoices	7 years after tax filing	VP Accounting	3 years	4 years
Invoice Register	7 years after tax filing	VP Accounting	3 years	4 years
Accounts Receivable Aging	7 years after tax filing	VP Accounting	3 years	4 years
Cash Receipts Journal	7 years after tax filing	VP Accounting	3 years	4 years
<u>Payroll</u>				
Payroll Journals	7 years after tax filing	VP Accounting	3 years	4 years
Labor Distribution	7 years after tax filing	VP Accounting	3 years	4 years

Payroll – Continued

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Expense Reimbursement Reports	7 years after tax filing	VP Accounting	3 years	4 years
Timesheets	7 years after tax filing	VP Accounting	3 years	4 years
Employee Earning Records	7 years after tax filing	VP Accounting	3 years	4 years
Year End Wage & Hour Report	Permanent	VP Accounting	3 years	Permanent
W-2's	Permanent	VP Accounting	3 years	Permanent

General Ledger

Detail Trial Balance	7 years after tax filing	VP Accounting	3 years	4 years
Budgets	7 years after tax filing	VP Accounting	3 years	4 years
Fixed Assets	7 years after F/A retired or sold	VP Accounting	3 years	7 years after F/A retired or sold
Depreciation Schedules	7 years after F/A retired or sold	VP Accounting	3 years	7 years after F/A retired or sold
Journal Entries	7 years after F/A retired or sold	VP Accounting	3 years	7 years after F/A retired or sold
Expense Allocation Schedules	7 years after F/A retired or sold	VP Accounting	3 years	7 years after F/A retired or sold
Summary Trial Balance	Permanent	VP Accounting	3 years	Permanent
Chart of Accounts	Permanent	VP Accounting	3 years	Permanent

<u>Tax</u>¹				
RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Federal form 990 & 990T	Permanent	VP Accounting	7 years	Permanent
Payroll Tax Returns	Permanent	VP Accounting	7 years	Permanent
State AG 990 & 990T	Permanent	VP Accounting	Permanent	
Real Estate Tax Exemptions	Permanent	VP Accounting	7 years	Permanent
Federal and State Trust Returns	Permanent	VP Accounting	7 years	Permanent
IRS Correspondence	Permanent	VP Accounting	7 years	Permanent
Federal form 1099's	7 years after tax filing	VP Accounting	3 years	4 years
<u>Documents</u>				
Audits	Permanent	VP Accounting	7 years	Permanent
Internal Audits	5 years	VP Accounting	7 years	
Government Audits	Permanent	VP Accounting	Permanent	
Appraisals on purchases	7 years after retirement or sale	VP Accounting	7 years	7 years after retirement or sale
Appraisals on Donations	7 years after tax filing	VP Accounting	7 years	Permanent
Bond, Loan, Mortgages, Notes Payable	7 years after retirement	VP Accounting	7 years	7 years after retirement
Bond Construction –Draws and Supporting Documents	7 years after retirement	VP Accounting	7 years	7 years after retirement
Security agreements and financing statements including guarantees and subordination agreements	7 years after expiration or retirement	VP Accounting	7 years	7 years after expiration or retirement
Deeds	7 years after sold	VP Accounting	3 years	7 years after sold
Documents Related to the Sale of Property	7 years after sale	VP Accounting	3 years	7 years after sale
Contracts/Leases	7 years after expiration	VP Accounting	7 years	7 years after expiration
Donor Agreements	Permanent	VP Accounting VP L&E VP Campaign	7 years	Permanent

¹ The documents referenced refer to all entities including supporting organizations, partnerships and trusts.

Documents – Continued

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Trust Documents	Permanent	VP Accounting VP L&E	7 years after trust dissolution	Permanent
Outside Trust Documents	Permanent	VP Accounting VP L&E	7 years after trust dissolution	Permanent
Bequests	Permanent	VP Accounting VP L&E	7 years	Permanent
Trust Statements	7 years after tax filing	VP Accounting	3 years	4 years
Investment Statements	7 years after tax filing	VP Accounting	3 years	4 years
K-1's From Investment in Partnerships	7 years after tax filing	VP Accounting	3 years	4 years
<u>Pension</u>				
Pension plans and all amendments thereto, pension plan determination letters	6 years after termination of plan	VP Accounting	6 years	
Records of employee service and eligibility for pension (including name, address, social security number, pay rate, hours worked and any breaks in service)	6 years after death of payee	VP Accounting	6 years	
Records of pension paid to employees or their beneficiaries	6 years after death of payee	VP Accounting	6 years	
Reports of pensions or pension plans filed with the Department of Labor or the Internal Revenue Service (including 5500s)	6 years after filing	VP Accounting	6 years	
Trustee Statements	7 years	VP Accounting	3years	4 years

<u>Insurance Records²</u>				
RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Policies - accidental death and dismemberment; worker's compensation; general and umbrella liability, auto, property, professional liability, crime, Directors & Officers, fiduciary and any other policies issued in the name of the corporations	Permanent	VP Accounting	5 years	Permanent
Certificates of Insurance	Permanent	VP Accounting	5 years	Permanent
Audits, adjustments, inspections by insurer or governmental agency	5 years after final adjustment or report	VP Accounting	5 years	Permanent
Loss runs	5 years	VP Accounting	5 years	
Group insurance plans including life, disability, medical, dental, travel/accident insurance	Until later of superceded or terminated or 6 years after death of last eligible participant	VP Accounting	6 years after superceded	6 years after death of last eligible participant
<u>Intellectual Property</u>				
Original patents and trademarks, records relating to all	Permanent	VP Accounting EVP Communications	Permanent	
Original Letters Patent/ Assignments	Permanent	VP Accounting	Permanent	
All copyright registrations and consents for use of third party copyrighted material	Permanent	EVP Communications	Permanent	
All permissions by photographers and subjects to use any photographs, including photos of employees	Permanent	EVP Communications	Permanent	

² The DOL says records reflecting benefits which are or may become due to any employee and employee names, addresses, etc. should be kept as long as they may be relevant.

Intellectual Property – Continued

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ON-SITE	OFF-SITE
Documents relating to the acquisition of any rights in any creative work	Permanent	EVP Communications	Permanent	
Patent interference, opposition, conflict nullity action, revocation or protest files (rights retained).	Permanent	VP Accounting EVP Communications	Permanent	
Trademark licensing agreements and distribution agreements, production and royalty data	Permanent	VP Accounting	Permanent	

6. Legal

Records in this area include records relating to litigation, settlements, correspondence with attorneys, etc.

No matter what retention period is indicated in the Retention Guidelines, all documents must be retained pertaining to a subject involved in active or threatened litigation or under investigation until legal action has been resolved and outside legal counsel has authorized destruction.

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Closing documents and due diligence files for acquisitions, mergers, consolidations, reorganizations and dissolutions if any	Permanent	EVP CFO, EVP P&A	Permanent	
Letters denying liability	No less than expiration of applicable statute of limitations	EVP CFO	No less than expiration of applicable statute of limitations	
Litigation and claims files	7 years after settlement or final disposition	EVP CFO	7 years after settlement or final disposition	
Arbitration demands, answers, records, decisions, settlement documents	7 years after settlement or final disposition	EVP CFO	7 years after settlement or final disposition	
Contract disputes	6 years after settlement or final disposition	EVP CFO	6 years after settlement or final disposition	
Settlements/Releases	Permanent	EVP CFO VP HR	Permanent	

7. Electronic

Records of this type include emails, Word, Excel, PowerPoint and PDF files developed and used in the normal course of business.

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Emails	Staff urged to keep folders clean. Old emails to be archived	Individual Staff Members and Supervisors		
MS Word, Excel, PowerPoint, Access or other electronic copies of files that are generated or used in hard copy	Same retention rules as the hard copy of the document	Individual Staff Members and Supervisors		
PDF, JPEG and other scanned or graphic files	Same retention rules as the hard copy of the document	Individual Staff Members and Supervisors		

8. Campaign Specific

RECORD TYPE	RETENTION PERIOD	INDIVIDUAL RESPONSIBLE	ONSITE	OFFSITE
Contributor History	Permanent	VP Campaign VP L&E		
Donor Letters	As deemed necessary	VP Campaign VP L&E	As deemed necessary	
Mission Participation	As deemed necessary	VP Campaign	As deemed necessary	
Pledge Cards	7 Years	VP Campaign	3 years	4 years
Pledge Payments	7 years	VP Campaign	3 years	4 years

9. Correspondence

The retention of correspondence should be based on the type of correspondence, many of which have been covered in the categories above, should be based on organizational need and historical significance.