

Document Retention and Destruction Policy

I. Purpose

In accordance with 18 U.S.C. Section 1519 and the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention and destruction of documents received or created by Pacific Crest Trail Association (PCTA) in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate PCTA's operations by promoting efficiency and freeing up valuable storage space.

II. Document Retention

PCTA follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

Corporate Records

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
By-laws	Permanent
Construction Documents	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Contracts (after expiration)	7 years
Correspondence (general)	3 years

Accounting and Corporate Tax Records

Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
General Ledgers	Permanent
IRS 990 Tax Returns	Permanent
Business Expense Records	7 years
IRS 1099s	7 years
Journal Entries	7 years
Invoices	7 years
Sales Records (PCTA store, special events)	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

Bank Records

Check Registers	Permanent
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years

Payroll and Employment Tax Records	
Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax returns	7 years
W-2 Statements	7 years
Employee Records	
Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Records Relating to Promotion, Demotion or Discharge	7 years after termination
Salary Schedules	5 years
Accident Reports and Worker's Compensation Records	5 years
Employment Applications	3 years
I-9 Forms	3 years after termination
Time Cards (see below regarding Federal Grant Records)	3 years
Volunteer Records	
Volunteer Profiles	Permanent
See Federal Grant Records retention period for the following Volunteer Records:	
Project Reports and Volunteer Timesheets	
Volunteer Agreements	
Job Hazard Analysis(es)	
Federal Grant Records	
Grant Applications and Proposals (Not Approved)	1 year
<i>The following grant documents will be retained for 3 years from date of submission of the final expenditure report or will be retained for the period required by the grant or program:</i>	
Grant Applications and Proposals (Approved)	
Grant Agreement and Subsequent Modifications	
Narrative Grant Reports	
Financial Status Reports	
Grant Expenditure Reports (Reimbursement Requests)	
Project Reports and Volunteer Timesheets	
Volunteer Agreements	
Job Hazard Analysis(es)	
Volunteer Sign-in Sheets	
Employee Time Cards	
Grant Statistical Documentation	
All Pertinent Formal Correspondence	
Grant Applications and Contracts (Foundation and Private)	Permanent
Donor Records and Acknowledgement Letters	Permanent
PCT Communicator Magazine	10 issues for 1 year, 4 issues Permanent
Legal, Insurance and Safety Records	
Appraisals	Permanent
Copyright Registrations	Permanent
Insurance Policies	Permanent
PCTA Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent
Leases	6 years after expiration
OSHA Documents (including safety training documentation)	5 years
General Contracts	3 years after termination

III. Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, 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 email 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.

IV. Emergency Planning

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

V. Document Destruction

PCTA's Finance and Human Resources Director is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of all documents on retention schedule 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.

VI. Compliance

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

This Policy was adopted by the PCTA Board of Directors on 10/24/10 at their meeting in Seattle, Washington.