

Records Retention and Destruction Policy

Purpose

The purpose of the policy is to ensure that necessary records and documents are adequately protected and maintained; and to ensure that records that are no longer needed by the National Council of Juvenile and Family Court Judges and its related entities, which are designated as the National Council of Juvenile and Family Court Judges Fund, Inc. and the National Juvenile Court Foundation (NCJFCJ) or are of no value are discarded at the proper time. The NCJFCJ shall retain records to comply with Federal and state laws and regulations, contractual obligations, and as necessary for historical reference.

Policy

This policy is in effect for all directors, officers, and employees of the NCJFCJ. Records and documents outlined in this Policy include paper and electronic files.

Administration

Attached is the Records Retention Schedule that is approved by the NCJFCJ's Audit Committee with final approval by the Board of Directors. The Human Resources and Internal Operations (HRIO) Department is responsible for oversight of this Policy and implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The HRIO Director is responsible for: monitoring local, state and federal laws affecting record retention and recommending changes to the Policy for approval by the Board of Directors, as necessary; annual review the record retention and disposal program; and monitoring compliance with this Policy.

It is the expectation of this Policy that duplicate documents are not retained by the NCJFCJ given cost management objectives. As such, only original documents (whether in paper or in electronic form) are retained and destroyed in accordance with the Records Retention Schedule below. Duplicate documents are destroyed at the time the original document has been adequately secured in proper location for retention under the Record Retention Schedule.

While the Records Retention Schedule reflects the retention schedule for certain categories of records, retention of a document not specifically identified in the schedule, should be determined primarily by application of the general principles of this Policy and the specific requirements below related to litigation-relevant materials. Questions regarding the retention of a particular document should be directed to HRIO for guidance.

Suspension of Record Disposal in Event of Litigation of Claims

In the event NCJFCJ is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning NCJFCJ or the commencement of any litigation against or concerning NCJFCJ, such employee shall inform the HRIO Director and any further disposal of documents shall be suspended until such time as HRIO, with the advice of counsel, determines otherwise. The HRIO Director shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Amendment

The Board of Directors may amend this Policy at any time.

Adopted by the NCJFCJ Board of Directors, November 14, 2019, Pittsburgh, Pennsylvania.

Record Category / Description of Records	Retention Period
Corporate / Governance Records	
<i>Minutes</i>	
Board meeting minutes, agenda/agenda packets	Indefinite
Advisory and Standing Committees meeting minutes, agenda/agenda packets	Indefinite
Subject Committees meeting minutes, agenda/agenda packets	2yrs
Senior management meeting minutes, agenda/agenda packets	2yrs
Recordings/notes taken to generate documented minutes	30 days following approval of minutes
Underlying support documents used to create agenda/agenda packets	30 days following approval of minutes
<i>Corporate Records</i>	
Articles of incorporation and bylaws (and all amendments)	Indefinite
Resolutions and written consents	
Federal/state income tax exemption applications, determination letters, correspondence from IRS/state agencies during determination process	
State and local sales tax exemption documents	
Licenses and permits (i.e. annual business licensing filing, etc.)	
<i>Board/Committee members</i>	
Board/Committee member lists	Indefinite
Strategic Plan	Until superceded
Administration	
<i>Administrative</i>	
<i>Legal Files/Papers</i>	
Legal opinions	Indefinite
Copyright, trademark, patent registrations.	Indefinite
Whistle-blower complaint records	Active+ 6yrs
Litigation files (i.e. settlement documents, Litigation claims, court documents and records, discovery materials and related documents/correspondence)	6yrs after close of case
Administrative support contracts (i.e. marketing, lobbying, legal, audit/acctg, IT, development, etc.)	6yrs after termination/expiration
Operational Policies (i.e. IT, investment, personnel, conflict of interest, whistle-blower, etc.)	Until superceded
Organizational chart	Until superceded

Record Category / Description of Records	Retention Period
<i>Government Relations/Membership</i>	
Government Relations	Current+ 5yrs
Annual Policy Agenda	
Testimony	
Appropriation Requests (Federal and/or State)	
Dear Colleague Letter	
Annual log of appropriation requests	
Federal / state appropriation requests forms	
Supporting documents generated to prepare the annual agenda / requests / letter / testimony	
Membership	
Membership directory	Current+ 5yrs
Member demographics, related records and renewal information (Membersuite)	Current+ 5yrs
Annual membership business meeting	
Minutes, agenda/agenda packets	Indefinite
Sign in /attendance sheets	5yrs
Membership correspondence	
General correspondence	General correspondence should be saved, if necessary, with corresponding records to which the correspondence relates.
Email correspondence re: voting requests	5yrs
<i>IT</i>	<i>Note: Destruction of IT records within policy to be coordinated with contracted IT service provider.</i>
Corporate Level	
IT policies	See Operational Policies section of retention policy
Employee acknowledgment of IT policies and procedures	See Human Resources section of retention policy
Disaster preparedness/recovery plans	Current+ 3yrs
Hardware maintenance/replacement schedule	Current+ 3yrs
Conversion/migration plans	3yrs
Security evaluations & reviews, risk analysis documentation	3yrs
Computer access log (i.e. documents evidencing access to an employee's computer)	3yrs
Help Desk logs/reports	1yr
Systems log files (i.e. security and access control logs, firewall traffic log, etc.)	90 days

Record Category / Description of Records	Retention Period
Applications	
Application development files/records, including source code and system	6yrs after program is discontinued
User access rights and privileges	Current+ 3yrs
Backup files	1yr
Email and general correspondence	Email messages/attachments along with general correspondence should be saved, if necessary, with corresponding records to which the email / correspondence relates. Original email deleted after 1yr
Finance/Grants Management	
<i>Finance</i>	
Annual (adjusted) general ledger	Indefinite
Chart of accounts	Current+ 3yrs
Annual trial balance	Current+ 3yrs
Journal entries	Current+ 3yrs
Internal control documentation	Current+ 3yrs
Reporting	
Audit reports (internal and external audits)	Indefinite
Year end unaudited financial statements	Current+ 3yrs
Interim financial statements	Current+ 3yrs
Workpapers and schedules prepared/compiled for use in audit	Current+ 3yrs after audit report issued
Annual budgets	Current+ 3yrs
Tax Records	
Regulatory rulings (IRS, DOL, etc.)	Indefinite
Federal tax returns (990/990T, 5500, etc.)	Indefinite
Other (nonpayroll) tax returns/filings (i.e. sales/use tax, if applicable)	Current+ 3yrs
Workpapers/documents used to generate tax returns / tax filings	Current+ 3yrs
Form 1099s	Current+ 3yrs
Assets	
Cash	Current+ 3yrs
Bank statements and monthly reconciliations	
Deposit slips, EFT evidence	
Accounts receivable ledgers and schedules, including bad debt documentation	Current+ 3yrs
Notes/Loans receivable - agreement, including amendments/modifications to original agreement. receipt documentation	Current+ 3yrs after expiration

Record Category / Description of Records	Retention Period
Investments	
Monthly and YTD investment statements	Current+ 3yrs
Trade confirmations - purchases	Indefinite, until 3yrs after sale of investment
Trade confirmations - sales	Current+ 3yrs
Annual Inventory - products, supplies, materials, etc.	Current+ 3yrs
Fixed assets	
Annual fixed asset listing, annual depreciation schedule	Current+ 3yrs
Purchase documents (purchase invoice, cancelled check, deed, etc.), including document evidencing asset was purchased with federal funds, if applicable	Indefinite, until 3yrs after sale/disposal of asset
Sale documents (bill of sale, copy of check/wire transfer doc, deed transfer, etc.), including documents evidencing use of proceeds for those assets originally purchased with federal funds, if applicable	Indefinite (land/real property); Current+ 3yrs (other)
Liabilities/Long Term Obligations	
Accounts payable ledgers and schedules	Current+ 3yrs
Notes/Loans/LOC obligations - agreement, including amendments/modifications to original agreement, payment documentation	Current+ 3yrs after expiration
Leases - agreement, including amendments/modifications to original agreement, payment documentation	Current+ 3yrs after expiration
Software licenses	Current+ 3yrs after expiration
Cash Receipts/Disbursements	
Check registers	Current+ 3yrs
Revenues	See Membership, Donor Records, Grant Award sections of retention policy
Expenses (non-payroll)	Current+ 3yrs
Cost estimates/bids	
Purchase orders, shipping docs, invoices, travel requests	
Travel request authorizations, related receipts documentation	
Credit card statements and related receipts documentation	
Petty cash vouchers and related documentation	
Employee expense reports and related receipt documentation	

Record Category / Description of Records	Retention Period
Payroll	Current+ 6yrs
Timecards	
Payroll registers and withholding reports	
Leave (vacation, sick) report	
Payroll tax reports and related documentation evidencing payment	
Benefit documents evidencing payment (403b contributions, insurance)	
Other documents evidencing payment of withholdings (garnishments, etc.) / benefits (unemployment, workers' comp, etc.)	
W-2s	
Donor Records	
Gift acceptance policy	See Operational Policies section of retention
Endowment agreement and related records (i.e. gift/contribution documents)	Indefinite
Endowment distribution supporting documents	Current+ 6yrs
Non-endowed gifts and donations	6yrs following 1) expenditure of the donor contributed funds; 2) satisfaction of the term of the gift/donation; or 3) expiration of the agreement, whichever is longer
Donor record (name, contact information) and acknowledgement letter	
Document evidencing terms of gift	
Contribution reports (annual/periodic reports of funds received and expended)	
Insurance Records	
Insurance policies/certificates	6yrs from termination of policy
Claims	
Property, D&O, Fiduciary liability, general liability claims	Indefinite
Work related injuries/illness claims	Indefinite (active claims); 7yrs (closed claims-nonhazardous); 30yrs (closed claims-hazardous related)
Self-funded health benefit claims	Indefinite (active claims); 6yrs (closed claims)

Record Category / Description of Records	Retention Period
Grants Management	
Grants awarded	Entire funding period+ 3yrs from submission of the last expenditure report
Proposal, including subsequent modifications and/or extensions	
Grant budget, including modifications	
Draw down requests/supporting documents evidencing receipt of funds	
Expenditure documentation evidencing use of funds	
Grant work product	
Performance reports	
Subrecipient award documentation, monitoring, related reporting, etc.	
Correspondence with granting agency/subrecipients	
Compliance documentation (i.e. cash mgmt, procurement, subrecipient monitoring, etc.)	
Grant proposals rejected	1 yr from date of rejection notification
Financial management records	
Schedule of expenditure of federal awards (SEFA)	Indefinite (as included in audit report)
Summary schedule of prior year audit findings	Indefinite (as included in audit report)
Corrective action plans	Indefinite (as included in audit report)
Indirect cost rate proposal	3 yrs from date of submission
Audit data collection form	3 yrs from date of submission
Supporting documentation used to compile above	Current+ 3yrs after related proposal/form/plan is submitted
Human Resources	
Corporate Records	
Retirement Plan Document, including amendments	Indefinite
Affirmative Action/EEO Files	6yrs
ADA compliance records	6yrs
HIPAA compliance records	6yrs
HR mgmt reports (i.e. company level reports re: classification, recruitment efforts, performance reporting, employee training reporting, employee demographic reporting, etc.)	3yrs
Internal HR study files (i.e. assessment documents re: company culture/employee	3yrs from close of study
Recruitment files	3yrs from close of recruitment process
Application files (i.e. unsolicited applications, volunteer applications)	1yr

Record Category / Description of Records	Retention Period
Job descriptions	Until superceded
Employee Records	
Disciplinary records and grievance records	6yrs from final action in the case/investigation
Sexual harrasment/Discrimination records	6yrs from close of investigation/case
Reasonable accomodation records	6yrs from date of separation of employment
Workers compensation files	See Insurance Records section of retention policy
Employee insurance and benefit claims files (health insurance claims, life and disability (AD&D) claims, property loss claims, etc.)	See Insurance Records section of retention policy
Employee personnel file	
Termination agreement, if applicable	Indefinite
Employment contract including amendments/modifications, if applicable	6yrs from date of separation of employment
Wage rate / salary documents, including changes	6yrs after record is superceded
Background investigation documents	6yrs from date of separation of employment
Employee demographics (SSN, address, DOB, DOH, etc.)	6yrs from 1) date of separation of employment, or 2) withdrawal of monies from 403b plan, whichever is longer
Signed acknowledgements (i.e Workplace safety acknowledgement/other OSHA forms, conflict of interest, IT, etc.)	6yrs from date of separation of employment
IRS/Other legal withholding documentation (W-4, garnishments, etc.)	6yrs after record becomes inactive, expired or is superceded
Employee insurance and enrollment records (including changes and corrections, authorization statements, COBRA actions, etc.)	6yrs after record becomes inactive, expired or is superceded
Retirement plan enrollment forms, contribution elections, distribution/loan requests	6yrs from 1) date of separation of employment, or 2) withdrawal of monies from 403b plan, whichever is longer
Medical related records (FMLA documentation, Parental Leave W/O Pay records, sick leave documentation, catastrophic leave records and similar types of records)	6yrs
Employment eligibility (I-9s, credentials, etc.)	3yrs from date of hire, or 1yr from separation of service, whichever is later
Supervisory review/performance evaluation records	Retain no longer than 1 review period

Record Category / Description of Records	Retention Period
Curriculum Development/Conference Management	
<i>Curriculum Development</i>	
State CLE accreditation documents	6 yrs
Training agenda and course materials	6yrs
Training sign in sheets/attendance records (original signature and electronic copy), CLE certificates/attendance acknowledgements, etc.	6yrs
Supporting materials and documents used to create curriculum	6yrs from close of program
<i>Conference Management</i>	
Conference program	6 yrs
Conference presentation materials	6yrs
Conference planning records, vendor/speaker contracts, and related documents and correspondence	6yrs
Conference sign in sheets/attendance records (original signature and electronic copy), CLE certificates/attendance acknowledgements, etc.	6yrs
Program Records	
Program Records*	
Final publication	Until Inventory of materials used
TA digital library	Indefinite
Grant proposal preparation documents (i.e. initiation forms, resumes, etc.)	
Awarded grants	Active+ 5yrs
Rejected grants	1 yr from date of rejection notification
Program calendars	Current+ 5yrs
Program activity records (i.e. contracts, grantor approvals and correspondence, team planning notes and related correspondence, supporting documents to generate ultimate work product, etc.)	Active+ 5yrs
Program compliance records	
Funding source requests / approvals / blanket exemptions, etc.	Active+ 5yrs
Human subject protection data	
Program progress reports	
TA feedback	
Templates / forms / logos / graphics, etc.	Until superceded
Program policies, procedures and checklists (i.e. travel, etc.)	Until superceded

Record Category / Description of Records	Retention Period
Research	
Final report or research article, including data analysis results, methodologies, protocols	Indefinite
Raw data used to generate report / article	5yrs from submission of final report, unless longer/shorter retention is specified by the sponsor, funding source or other regulation
Templates / forms	Until superceded
* if particular program is research related, see Research section of retention policy for additional guidance	