

Record Retention and Destruction Policy

Together 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, participants, litigation, audits, and investigations.

The information listed in the retention schedule below is intended as a guideline and may not contain all the records Together may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the President & CEO, or his/her/their designee.

From time to time, the President & CEO, or his/her/their designee, 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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the President & CEO or his/her/their designee.

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
Participant 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 after date of hire
	Withholding tax statements	7 years
	Timecards	3 years
Technology	Software licenses and support agreements	7 years after all obligations end
Pantry	USDA/TEFAP Participant Signature Forms	3 years, with fiscal year being Oct - Sept
	HMIS Forms	1 year
	Milk 2 My Plate Receipts	1 year
Operations	Safety Data Sheets	30 years

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 an employee 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.

Emergency Planning

Together’s records will be stored in a safe, secure, and accessible manner. Files that are essential to keeping Together operating in an emergency will be maintained in the Cloud.

Document Destruction

The Director of Human Resources and Director of Finance, or his/her/their designee, 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, participant 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.

Compliance

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