



RECORD RETENTION AND DESTRUCTION

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, 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 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 or her designated agent or employee.

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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the President & CEO, or his or her designated agent or employee.

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.

Emergency Planning

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

Document Destruction

The President & CEO, 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.

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.