


<b>Category:</b>	Financial	<b>INCA Community Services Financial Policy</b>  
<b>Effective Date:</b>	1/1982	
<b>Revised/Review Date:</b>	1/2018, 1/2019, 3/20, 3/21, 3/22, 3/23, 3/24, 3/25, 3/26	
<b>Forms:</b>	n/a	
Responsible: Program Director, Financial Director		

## Record Retention and Destruction Policy

### Introduction/Purpose

The purpose of this 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 INCA Community Services are of no value are discarded at the proper time and way. This Policy is also for the purpose of aiding employees of INCA Community Services in understanding their obligations in retaining electronic documents - including email, web files, text files, sound and movie files, PDF documents, or other formatted files.

### Policy

INCA Community Services, Inc. retains records as required by law or grant/contract terms and conditions and destroys them when no longer required or needed. Some important documents are kept permanently. The policy generally applies to both paper and electronic records, but distinctions in practice between the two are noted where appropriate. Once records are no longer needed, care must be taken to ensure that records containing confidential information are shredded or otherwise disposed of to ensure that the confidential information is not disclosed.

### Responsible for Retention/Training/Monitoring

Each director/coordinator/project manager or designated personnel is responsible for checking contract or grant requirements to ensure that record retention are met. Directors are also responsible for ensuring that procedures are in place to follow this policy, including training and monitoring.

### Suspension of Record Disposal in the Event of Litigation or Claims

Once the document retention period has expired and are no longer needed, the documents shall generally be destroyed and any confidential documents and/or those containing "Personal Information" shall be shredded. "Personal Information," is the first name and last name or first initial and last name of a person in combination with any one or more of the following data.

### Record Retention Period

- The required period for retention of records is listed below.

- Unless otherwise noted, you may retain the records for a longer period if necessary for the administration of the program and if there is available storage space.
- Records may be kept in electronic or hard copy form,
  - If records are kept in electronic form, you should consult with the Senior Bookkeeper in the administrative office to ensure that the records will be accessible when needed.
  - In addition, if records are kept in hard copy form, they should be stored in a dry place and boxed up with the year and contents labeled on the box. Boxes should be stored in a safe place under lock and key.

### **Documentation Destruction and Litigation Holds**

Once the document retention periods has expired and are no longer needed, the documents shall

- Generally be destroyed
- Any confidential documents and/or those containing “Personal Information” shall be shredded.
  - “Personal Information” is the first name and last name or first initial and last name of a person in combination with any one or more of the following data elements that relate to the person:
    - Social Security number (“SSN”);
    - Driver’s license number or state-issued identification card number; or
    - Financial account number, or
    - Credit or debit card number.
- If there is pending litigation, claims, audits, or investigations related to the grant, program, or record, the record may not be destroyed and must be retained until those matters are completed.
- In addition, in accordance with 18 U.S.C.1519 and the Sarbanes Oxley Act a document shall not be knowingly destroyed with the intent to obstruct or influence an “investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States ... or in relation to or contemplation of such matter or case.”

### **Retention Operational Guidelines**

If records required to be retained are kept electronically, they must be kept in or moved to a shared network drive. If electronic records must be kept electronically, please consult with the administrative office. When paper records are put in an offsite or onsite storage area, they must have a label indicating what they are, the department and person responsible for them with the phone number, and a “destroy by” date.

### **General Program Records**

**State funds or state contracts** – Records required to be kept in connection with a program funded by, or pursuant to a contract with the State of Oklahoma, including client records and other records supporting INCA’s compliance with contract terms and conditions and costs charged to the contract (including, for example, attendance records) shall be kept for a period of six years after termination of the contract. Not all client records need to be kept, but retained records should include documentation of a client’s eligibility and nature of service provided.

**Federal funds, no state contracts** – 4 years generally, permanently for close-out records and monitoring reports. If a program receives federal grant funds then the record retention period is four years after termination of the federal grant, except that grant close-out records, including but not limited to monitoring or audit reports and corrective action plans and reports, if any.

**No state or federal funds, grants or contracts** – Longer of 4 years or required record retention period. If no state or federal funding, grants, or contracts are involved, the record retention period is the longer of four years after completion of the program or the record retention period required by the funding source, if any.

**Contracts with consultants, businesses, and other private parties** – Six years after expiration. Notwithstanding the record retention periods stated in the general programs section, contracts between INCA and a private party (not the government), and records in connection with them shall be kept for a period of six years after termination of the contract.

**Additional specific program record retention requirements.** Some programs may have additional specific record retention requirements. To the extent such requirements exist, information related to them will be included in the Record Retention Schedule.

**Record Retention Schedule 2024**

Description	Retention Period (years or permanently-P)
Financial/Accounting Records	
Accounting Policies & Procedures	7
Accounts Payable & Schedules	7
Accounts Receivable Ledgers & Schedules	7
Audit Reports	P
Bank Deposit Slips	3
Bank Reconciliations	3
Bank Statements	7
Budgets	4
Chart of Accounts	P
Check Disbursement Requests	7
Correspondence, general or routine	2
Cost Allocation Records	4
Depreciation Schedules	P
Donations to INCA Community Services	7

Form 990	P
Financial Statements- Year End (Including grant-specific revenue & expense, balance sheets)	P
Garnishments	5
General Ledgers/Year End Trial Balance	7
Grants/Contracts from Funding Sources	7
Invoices (to customers, from vendors) & Related Records	7
Journals/Ledgers (electronic)	7
Notes Receivable Ledgers & Schedule	7
Payroll Records & Summaries, including Leave Records	7
Time Sheets	7
Travel Advance & Reimbursement Records	7
Withholding Tax Statements (W-2)	7
Tax-Exemption Documents and Related Correspondence	P
Excise Tax Records	P
Payroll Tax Records	7
Tax Bills, Receipts, Statements	7
Tax Returns - Income, Franciese, Property	7
Tax Workpaper Packages - Originals	7
Sales/Use Tax Records	7
Annual Information Returns - Federal and State	P
IRS or other Government Audit Records	P
Litigation Files and Claims	10 years after resolution
Court Orders	10
Request for Departure from Records Retention Plan	10
Immaterial (i.e. invitation to events, etc.)	Retain Only as Necessary
INCA Corporate Records	
Annual Reports Filed with Secretary of State for	P

Oklahoma	
Articles of Incorporation & Amendments Thereto	P
By-Laws & Amendments Thereto	P
Minutes of Meetings of Board of Directors & Committees	P
Letter of Tax-Exempt Determination from IRS	P
Certificate of Good Standing with the State of Oklahoma	P
Tax-Exemption Certificates & Other Documentation from State	P
Contracts, Mortgages, Notes & Lease	6 after Expiration of Document
Claims & Litigations	10 Years after Resolution
Trademark Registrations & Copyrights	P
Correspondence	
Of Historical or Legal Importance	P
General	4
Routine	1
Significant and Long Term Consequences	P
Immaterial (i.e. invitation to events, etc.)	Retain Only as Necessary
Insurance Records	
Insurance Policies (expired)	20
Insurance Records (claims, etc.)	10
Annual Loss Summaries	10
Audits and Adjustments 3 years after final adjustment	
Certificates Issued to INCA Community Services	P
Claims Files (including correspondence, medical records, injury documentation, etc.)	
Group Insurance Plans - Active Employees	Until Plan is amended or terminated
Inspections	3
Journal Entry Support Data	7
Loss Runs	10

Release and Settlements	P
Procurement Records (Bookkeeping)	
Purchase Orders (bookkeeping)	7
Purchase Requisitions (bookkeeping)	7
Receiving Reports (bookkeeping)	7
Bids/Vendor Selection Records (bookkeeping)	7
Copies of Purchasing Documents held by Departments other than Bookkeeping, the Originals of which are held by Bookkeeping	1
Property Records	
Deeds, Mortgage & Bills of Sale- including Funding Source (Executive Secretary)	P
Depreciation Schedules (bookkeeping)	P
Inventories (bookkeeping)	6
Property Appraisals (Executive Secretary)	6 after Expiration
Routine Repair/Maintenance Orders & Records (bookkeeping)	7
Records of Significant Repairs	P
Human Resources Records	Documents retained by HR Dept. Unless noted otherwise
Application (not hired)	1
Application (not hired) contains OSBI	3
Application (not hired) offer made	4
Job Description	7
Benefits Records	7
Criminal Background Check Records for Hired Employees	3
Criminal Background Check Records for Not Hired Employees	3
I-9's	3 after termination
Retirement Benefit Records	P
Personnel File- Current Employee	
• I-9	P
• Application	P
• Resume	P

<ul style="list-style-type: none"> <li>• Job Description</li> <li>• Payroll Authorization</li> <li>• Hiring Packet</li> <li>• Evaluation &amp; Other Records Relating to Performance</li> <li>• Change of Status</li> </ul>	P P P P P
Wage Claims	P
Leave Files, including FMLA	3
EEO Complaint Records (after complaint resolution)	3
EEO-1/EEO-2 - Employer Information Reports	2 Years after superseded or filing (whichever is longer)
Employee Medical Records	Separation + 6
Employment Contracts - Individual	7 years after separation
Correspondence with Employment Agencies and Advertisements for job Openings	3 years from the date of hiring decision
Personnel Court Records	3
Public Information Records	
Press Releases	3
Program Brochures	6
Articles & Press Clippings	P
Annual Reports	P
Proposals & Fundraising	
Proposal (funded)	
<ul style="list-style-type: none"> <li>• Direct Federal Funding</li> </ul>	4
<ul style="list-style-type: none"> <li>• Other Gov't Funding (state &amp; local)</li> </ul>	7
<ul style="list-style-type: none"> <li>• Private Funding Agency (or more as required)</li> </ul>	4
Proposal (unfunded)	1
Records of Fundraising Events	4
Correspondence	3
Executive & Admin Office Records	
Correspondence (non email)	
<ul style="list-style-type: none"> <li>• Of Historical Importance</li> </ul>	P

<ul style="list-style-type: none"> <li>General Correspondence (and not kept by one of the dept's listed above)</li> </ul>	3
<ul style="list-style-type: none"> <li>Routine, not of Significance</li> </ul>	2
Electronic Documents	
Correspondence (i.e.- email both internal and external, text, etc.)	1
Business Correspondence	3
Equipment Location & Maintenance Records	Length of Lease/Life of Equipment
Contracts, Leases, & Addenda, Related Proposals & Correspondence	6 years after lease or termination
PDF Documents	6
Electronic and Paper Copies	As required
Miscellaneous Documents	
Consultant's Report	2
Material of Historical Value (including pictures and publications)	P
Policy and Procedures Manuals - Original	Current version with revision history
Policy and Procedures Manuals - Copies	REtain current version only
Annual Reports	P
<b>Dissemination of Policy</b>	
The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.	