

## **ECIA Records Retention, Destruction and Management Policy**

### **1) Purpose**

The purpose of this Policy is to ensure that necessary records and documents are protected and maintained, as well as to ensure that records no longer needed or of no value are destroyed at the proper time. This Policy is also for the purpose of aiding staff in understanding its obligations in managing electronic documents – including email, Web files, text files, audio and visual files, PDF documents, Apple, and Microsoft Office as well as other formatted files.

### **2) Policy Management**

This Policy is the ECIA policy governing the retention and destruction of records, including electronic documents. The General Manager of ECIA is designated as Records Management Administrator.

### **3) Administration**

Below is the Record Management Schedule as approved by the Board of Directors. The Records Management Administrator is designated to administer this Policy and implement processes and procedures to ensure that the Record Management Schedule is followed. The Records Management Administrator is authorized to make modifications to the Records Management Schedule from time to time to ensure timely compliance with local, state, and federal laws, develop appropriate document and record categories, monitor local, state, and federal laws affecting records management. All such modifications shall be reported to the Board of Directors at the earliest practicable time. The Records Management Administrator shall annually review the Policy and make recommendations to the Board for amendments to the Policy as may be appropriate.

### **4) Suspension of Record Disposal in the Event of Litigation or Claims**

In the Event ECIA is served with any subpoena or request for documents or the Records Management Administrator becomes aware of a governmental investigation or audit concerning ECIA, or the commencement of any litigation against or concerning ECIA, the Records Management Administrator shall immediately suspend destruction of documents until such time as ECIA Legal Counsel determines that such suspension is no longer required.

### **5) Applicability**

This Policy applies to all records generated in the course of ECIA operation, including both original documents and reproductions. Electronic documents are specifically included in this applicability.

### **Records Management Schedule**

The following Records Management Schedule is divided into sections. The Letter **P** means permanent retention. The **Numerals** are the number of years to be retained. Retention can be either paper and/or digital/cloud. A back-up off site is required of all documents retained.

## **Section A. Accounting and Finance**

Accounts Payable ledgers and schedules – 7

Accounts Receivable ledgers and schedules – 7

Annual Audit Records, including work papers, other documents that relate to the Audit – 7

Annual Plans and Budgets – 2

Bank Statements and Canceled Checks – 7

Staff Expense Reports – 7

General Ledgers – P

Interim Financial Statements -- 7

Investment Records – 7

Credit Card Records – 3

## **B. Contracts**

Contracts and related correspondence, including any proposal that resulted in a contract and all other supporting documentation – 7 after expiration or termination

## **C. Corporate Records**

Minute books, signed Board minutes and all committees, corporate seals, articles of incorporation, bylaws, covenants, annual corporate reports, licenses and permits – P

## **D. Correspondence and Internal Memoranda**

General Guidelines: Most correspondence and internal memoranda should be retained for the same document they pertain to or support. Example: a letter pertaining to a contract would be retained as long as the contract (7 years after expiration). Records that support a project should be kept with that project and are part of the retention time of that particular project file.

Correspondence and memoranda that do not pertain to documents having a prescribed retention period may generally be destroyed sooner. These may be divided into two categories:

1. Those pertaining to routine matters without significant consequences may be destroyed within two years. Examples:
  - Routine letters and notes that require no acknowledgement or follow-up, such as notes of thanks, congratulations, transmittal letters, plans for meetings
  - Form letters that require no follow-up
  - Letters of general inquiry and replies completing a cycle of correspondence
  - Letters of complaints requesting specific action after changes are made or action taken

Copies of internal correspondence and documents where a copy will be in the originating department files should be read and destroyed unless it contains information providing reference or direction to other documents to preserve project traceability.

2. Those pertaining to non-routine matters or having significant lasting consequences should be retained permanently.

#### **E. Electronic Documents**

1. Electronic mail (email) – both internal and external – may be deleted after 24 months subject to Paragraph 4.
  - Staff will keep all of their email related to business issues consistent with this policy
  - ECIA will archive email for 12 months after deletion, after which time it will be permanently deleted
  - All ECIA business related email will be downloaded to a service center, or user directory on the ECIA server, or the Cloud
  - Staff will not store or transfer ECIA related email on non-work related computers except as necessary or appropriate for ECIA purposes
  - Staff will not send confidential/proprietary ECIA to outside sources
  - Email staff deems vital to the performance of their job should be copied to a separate drive location designated by the Records Management Administrator
2. Electronic Documents, including but not limited to Microsoft Office Suite, PDF files, and Apple source.
  - PDF files, subject to the provisions of this Policy – 5
  - MS Office Suite, subject to the provisions of this policy – 5
  - Apple source, subject to the provisions of this policy – 5
3. Web Page Files: Internet Cookies should be deleted once a month unless directly related to ECIA business purposes.

The Records Management Administrator will develop and implement a backup copy system of all electronic files on ECIA network. Such system will include onsite and offsite locations. The offsite location may be the Cloud.

#### **F. Insurance Records**

Annual Loss Summaries – 10

Audits and Adjustments – 3 after final adjustment

Certificates Issued to ECIA – P

Claims Files, including correspondence, medical records, injury, other documentation – P

Inspections – 3

Insurance Policies, including expired policies - P

Releases and Settlements – 20

## **G. Legal Files and Papers**

Legal Correspondence, Memoranda, and Opinions, including all related files – 7 except as needed

Litigation Files – 2 after final disposition

Court Orders – P

Requests for Departure from Records Management Policy – 10

## **H. Miscellaneous**

Consultant Reports – 5 except as needed

Historical – P

Policy and Procedures Manual – Current, with revision history

Annual Reports – P

## **I. Payroll Documents, Employees, Personnel**

Subject to definition as of 07-2017

## **J. Property Records**

Correspondence, Property Deeds, Assessments, Licenses, Rights of Way – P

Original Sale/Purchase/Lease – P

Property Insurance Policies – P

## **K. Tax Records**

Tax Exemption Documents and Related Correspondence – P

IRS Rulings – P

Tax Bills, Receipts, Statements – 7

Tax Returns, Income – P

Tax Work papers – 7

Annual Returns both Federal and State – 10

IRS or other Government Audit Records -- P