

ECHO

RECORD RETENTION POLICY

ECHO takes seriously its obligations to preserve information related to litigation, audits, and investigations.

The information listed in the schedule below is intended as a guideline.

It does not contain records that ECHO may be required to retain in the future.

Questions regarding the retention of documents not listed should be directed to the Executive Director.

From time to time, the Executive Director may issue a notice, known as a “legal hold”. This hold will suspend 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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the President of the Board.

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	7 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	7 years after all obligations end
	Correspondence — general	5 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
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	Permanent
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
	Withholding tax statements	7 years
	Timecards	3 years
Technology	Software licenses and support agreements	7 years after all obligations end

1. Electronic Documents and Records.

Electronic documents will be retained as if they were paper documents. Any electronic files that fall into one of the document types noted above will be stored for the appropriate amount of time. If a user has sufficient reason to retain an e-mail message, the message will be printed in hard copy and filed or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

2. Emergency Planning.

ECHO's records will be stored in safe, secure, and locked cabinets. **Documents and financial files essential to keeping ECHO operating in an emergency will be duplicated or backed up and stored off-site.**

3. Document Destruction.

The Executive Director is responsible for the ongoing process of identifying records which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or pending lawsuit. Destruction will be reinstated upon conclusion of the investigation.

4. Compliance.

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against ECHO and its employees. Disciplinary action will be taken against responsible individuals. The Executive Director and the President of the Board will periodically review these procedures with legal counsel to ensure compliance with new or revised regulations.