

DOCUMENT RETENTION AND DESTRUCTION POLICY

Purpose

Leave No Trace Center For Outdoor Ethics, a Colorado nonprofit corporation (“LNT”), strives to ensure that necessary records and documents are adequately protected and maintained, and to ensure that records that no longer are needed or are of no value are timely discarded.

Responsibility and Authorities

The Executive Director will recommend an individual to be designated by the Board as the Document Retention Officer (the “DRO”). From time to time, the DRO may work with designated LNT staff to conduct an annual review of all records and forms to determine those to be destroyed. The DRO also may present reports to the Audit Committee regarding document retention issues.

Temporary Policy Suspension

In the event of a threatened or actual governmental audit or investigation, or threatened or actual litigation, LNT will make reasonable efforts to suspend the destruction of any documents reasonably believed to be relevant to the audit, investigation or litigation until the matter is resolved. Each member of LNT’s staff (including volunteers) (collectively, the “LNT Staff”) is responsible for suspending the destruction of documents reasonably believed to be relevant to a threatened or actual governmental audit or investigation, or threatened or actual litigation.

Guidelines

The attached guidelines are intended to instruct the LNT Staff on the length of time they should maintain certain categories of documents. It may be necessary to depart from these guidelines for business or other reasons.

These guidelines are intended to meet or exceed the document retention requirements imposed by government regulations and statutes. LNT expects the LNT Staff to follow such regulations or statutes. The LNT Staff should alert the DRO whenever a conflict between these guidelines and regulations or statutes exists.

Document Retention and Destruction Guidelines

I. CORPORATE GOVERNANCE – Permanent, unless otherwise indicated

A. Organizational Documents (including amendments)

Articles of Incorporation
By-Laws
Board Committee Charters
Federal, State, and Local Tax Exemption Applications and Certificates

B. Board of Directors

Minutes of Board Meetings (including Committee Meetings)
Record of Actions Taken by Board without a Meeting
Materials for Board Meetings (including Committee Meetings)
Board Policy Statements
Superseded Board Policy Statements..... 7 years
Board and Committee Compensation Records 7 years
Conflict of Interest Disclosures While Active + 7 years
Board-Approved Guidelines and Procedures (document retention policy, whistleblower policy, etc.)

II. LEGAL RECORDS -- Permanent, unless otherwise indicated

Copyright and Trademark Registrations
Real Property Deeds, Mortgages and Easements
Debt and Other Loan Agreements (including Notes)
Licenses..... While Active + 2 years
Leases (real or personal property)..... While Active + 7 years
Contracts and Agreements While Active + 7 years
Insurance Policies
Insurance Reports and Claims While Active + 7 years
Course Participant Medical Questionnaires..... Permanent, subject to HIPAA regulations as amended from time to time

III. LITIGATION RECORDS – While Active (including appeals) + 2 years

Claims
Court Documents and Records
Deposition Transactions
Discovery Materials
Litigation Files

IV. TAX RECORDS -- Permanent

Federal, State and Local Tax Returns
Property Tax Exemptions and Applications, Assessments, and Appeals

Tax Audit Proceedings
 Correspondence with Taxing/Other Regulatory
 Authorities
 Excise Payments and Supporting Work Papers

V. AUDIT AND ACCOUNTING RECORDS – Permanent, unless otherwise indicated

Annual Reports
 Audited Financial Statements
 Auditor Opinions and Management Reports
 Internal Financial Reports..... 3 years
 Chart of Accounts
 General Ledger and End of Year Trial Balances
 Journal Entries
 Banking Resolutions
 Banking Authorizations While Active + 7 years
 Bank Statements/Reconciliations..... 7 years
 Accounts Payable Ledgers 7 years
 Bank Deposit Slips and Cash Receipt Journals 7 years
 Cancelled Checks..... 7 years
 Employee Business Expense Reports 7 years
 Purchase/Shipping/Delivery Orders..... 2 years
 Paid Bills, Statements and Invoices (Taxes and Capital
 Assets) 7 years
 Support for Endowment Contributions/Gifts..... 7 years
 Fixed Assets Depreciation Schedules
 Annual Budgets..... 3 years
 Internal Financial Forecasts 3 years
 Business Plans..... 3 years
 Investment Agreements (Trusts, Partnerships,
 Subscriptions, etc.) While Active + 7 years
 Investment Valuation and Financial Activity Reports..... 7 years
 Investment Financial Statements and Performance
 Reports 7 years
 Due Diligence Materials (after rejection) 2 years
 Due Diligence Materials (after acceptance)..... While Active + 7 years
 Simple IRA Records

VI. ELECTRONIC COMMUNICATIONS – Consistent with paper schedules

Emails
 Electronic Data Files

VII. HUMAN RESOURCES – While Active + 7 years, unless otherwise indicated

A. General
 Employee Handbook, Policies and Procedures Permanent
 Superseded Employee Handbook 10 years
 Benefit Plan Descriptions and Reports While Active + 1 year
 Job Announcements/Advertisements..... 1 year
 Records Relevant to Charges of Discrimination or
 Action Against Employee While Active + 2 years

B. Individuals Not Hired

Employment Application/Resume	1 year
Letters of Recommendation.....	1 year

C. Personnel Files

- Employment Application/Resume
- Letters of Recommendation
- Personnel Action Forms (Salary adjustments, leaves, transfers, promotions, etc.)
- COBRA and Other Group Insurance Coverage Notification
- Job Description
- Performance Reviews
- Unemployment and Workers Comp Claim Notices and Agency Communications
- Disciplinary Warnings and Other Actions
- Conflict of Interest Disclosures

E. Payroll Records

- Wage and Salary History
- Time Sheets
- Employee Wage and Tax Statements W-2 Form
- Employee Tax Withholding Elections W-4 Form
- Garnishments
- Benefits Elections and Salary Deductions
- Employment Eligibility (I-9 Form)

D. Accounting Payroll Files

- Accounting Payroll Files
- Payments of Records of Employment Taxes
- Payroll Ledger
- Paid-Time-Off Summaries/Authorizations While Active + 2 years

VIII. FACILITIES RECORDS – While Active, unless otherwise indicated

Building Permits	While Active + 5 years
Building Plans/Specifications	Permanent
Office Layouts	
Permits (zoning and operating)	
Maintenance Records	
Office Space Agreements	While Active + 2 years

IX. GRANT MATERIALS– While Active + 7 years, unless otherwise indicated

A. Grants Payable

Proposals/Applications, including Required Supporting Materials (declinations).....	2 years
Selection Committee Records, including criteria used and other documentation regarding selection process..	3 years
Grants Payable Ledgers and End-of-Year Trial Balance.....	7 years
Grant Application Guidelines	Permanent
Grant Funding Priorities	Permanent

B. Grants Receivable

- Original Grant Proposals
- Staff Proposal Summaries
- Grant Agreements (and modifications, if any)
- All Pertinent Formal Correspondence
- Documents of Expenditures for which Grants Were Used
- Grants Receivable Ledgers and End-of-Year Trial Balance 7 years
- Grant Work Product Produced with Funds Received
- Copies of Receipts for Payment of Grants Received

X. COMMUNICATIONS -- Permanent

- Honorary Proclamations, Awards and Letters of Historic Value
- Signed Books
- Photographs (digital and hard copy)
- Newspaper Articles
- Media Work Product (audio, video, print, interview notes)
- Archived Documents
- Communications Procedures