



Alpha Delta State Ohio Educational Foundation

DOCUMENTS MANAGEMENT POLICY: RETENTION AND DESTRUCTION

OPERATING POLICY

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I. PURPOSES

- A. Directors are accountable for paper and electronic records and documents received or created in the administration of the Foundation.
- B. This Documents Management Policy is developed to:
 1. establish consistent guidelines and an approved schedule for review, retention, and destruction of the Foundation's records and documents;
 2. inform Directors about the location of specific documents;
 3. ensure compliance with federal and state laws regarding the Foundation's federal tax-exempt status, and consider all statutes of limitations in the event the Foundation is involved in legal investigation;
 4. respond to one provision of the Sarbanes-Oxley Act of 2002 (SOX) designed to promote transparency, accountability, and proper handling of documents;
 5. evaluate successes and problem areas of Foundation programs;
 6. keep a permanent history of proceedings of the Foundation and distribution of Foundation funds;
 7. guard against improper disposal or destruction of documents;
 8. treat hardcopy and electronic documents equally in terms of retention and destruction;
 9. guide the Board of Directors' commitment to transparency and accountability for all Foundation stakeholders;
 10. improve donor confidence in the nonprofit sector.

II. DIRECTIVES

A. The Policies Committee shall:

1. advise the Board Chairman to place certain documents on the Board agenda for review;
2. advise Directors when documents are due for destruction or archiving;
3. oversee the scheduled destruction of documents regardless of physical form.

B. Directors, Officers, and Committee Chairmen responsible for specific documents shall:

1. have the option to present reasons for retention or destruction of selected documents;
2. follow the Board procedure for retention or destruction.

III. DOCUMENT RETENTION

A. The Board of Directors shall determine where to store active, semi-active and inactive records and documents that are retained for fiscal, historical, and legal reference.

B. Electronic storage shall be monitored to ensure latest developments in technology are considered and documents stored electronically can still be accessed.

C. Documents are retained to:

1. keep active and semi-active records available for users for reference, updates, comparison, and convenience;
2. easily provide documentation for reporting Foundation activities to the Ohio Secretary of State, the Ohio Attorney General, and the Internal Revenue Service (IRS);
3. provide a history of the proceedings of the Foundation;
4. respond to questions and information requested by Foundation's stakeholders – members, donors, grantors, and the public;
5. provide evidence in the event the Foundation is involved in legal action either as plaintiff or defendant.

D. Recommended retention and/or storage includes, but is not limited to:

1. online backup service;
2. cloud storage service;
3. hardcopy following consistent filing topics;
4. external hard drives;
5. archives at Ohio History Connection, 800 E. 17th Avenue, Columbus, OH, 43211, for copies of important documents or documents of historical significance. OHC is permanent storage. Documents may be copied but cannot be removed or replaced with updated or amended documents.

IV. DOCUMENT DESTRUCTION

A. The Board Secretary maintains a permanent cumulative record of all hardcopy and electronic documents that have been destroyed.

B. Documents are destroyed to:

1. reduce the time-consuming work of searching through outdated documents;
2. avoid the unnecessary expense of storing documents too long;
3. allow for disposition of obsolete or duplicate documents and records;
4. remove inactive documents that are no longer required to carry out administrative or operational functions, are beyond required federal and state retention requirements for possible litigation, are not required to be maintained or archived permanently, and are not needed for historical reference;
5. avoid the unnecessary and often extreme costs of requests for electronic discovery, and/or investigative search through hardcopy documents, in the event these documents are ordered to be produced, and witnesses are subpoenaed to be deposed, due to litigation or federal investigation;
6. inform legal counsel and/or federal investigators, in the event of litigation or investigation, that certain documents have been destroyed according to Board policy.

C. Stop document destruction.

1. The Board Chairman orders all document destruction stopped if the Foundation is involved in a dispute that could result in litigation or is being investigated by a governmental law enforcement agency.
2. Document destruction is resumed only upon written approval of legal counsel and at the direction of the Board Chairman.

D. Electronic documents, files, emails, and any hardcopies of the same are destroyed as scheduled for the topic they address.

E. Accomplish document destruction with Board Directors and committees.

1. The Policies Committee is responsible to provide each director with a list of documents due for destruction at the last Board meeting of the fiscal year in accordance with the Board-approved Documents Retention and Destruction Schedule.
2. Advised by the Policies Committee, the Board Chairman shall establish an agenda item for the Policies Committee to review which documents are due for destruction.
3. Directors are each responsible to cross-cut shred hardcopy documents and to erase electronic documents due for destruction.
4. Putting hard copies and electronic devices in the trash is prohibited. Deleting electronic documents does not erase them.
5. Directors whose terms are expiring shall turn over all documents and records to the Policies Committee at the last Board meeting of the fiscal year.