

Cottage Cove Document Retention and Destruction Policy

Introduction

The Sarbanes-Oxley Act addresses the destruction of business records and documents and turns intentional document destruction into a process that must be carefully monitored.

Policy

Cottage Cove shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy includes paper, electronic files (including email) regardless of where the document is stored, including ministry network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities

In accordance with 18 U.S.C Section 1519 and the Sarbanes-Oxley Act, the staff, board, and volunteers of Cottage Cove shall not knowingly destroy a document with the intent to obstruct or influence an “investigation or proper administration of any matter within the jurisdiction of any department agency of the United States...or in relation to or contemplation of such matter or case.” If an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction.

In order to eliminate accidental or innocent destruction, Cottage Cove has the following document retention requirements:

Type of Document	Minimum Requirement
Accounts payable ledgers and schedules	7 years
Application for DPA loans (did not close)	1 year
Audit reports	Permanently
Bank Reconciliations	3 years
Bank statements	3 years
Chapter 7 and Foreclosed loans	6 years
Charged off loans	6 years
Checks (for important payments and purchases)	Permanently
Checks--cancelled	7 years
Closed loans	6 years
Contracts, mortgages, notes and leases (expired)	7 years
Contracts (still in effect)	Permanently
Correspondence (general)	1 year
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Declined DPA Applications	25 months from date of action
Deeds, mortgages, and bills of sale	Permanently
Depreciation Schedules	Permanently
Duplicate deposit slips	2 years
Employment applications	3 years

Expense Analyses/expense distribution schedules	7 years
Financial Statements – year end	Permanently
Foreclosure records	6 years
Insurance Policies (expired)	3 years
Insurance records, current accident reports, claims, policies, etc.	Permanently
Internal audit reports	3 years
Internal reports (miscellaneous)	2 years
Inventories of products, materials, and supplies	2 years
Invoices (to customers, from vendors)	7 years
Minute books, bylaws and charter	Permanently
Paid off loans	6 years
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years
Property records	Permanently
Purchase orders	7 years
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Timesheets (if required to be recorded)	3 years
Trademark registrations and copyrights	Permanently
Vouchers for payment to vendors, employees, etc	7 years
Withholding tax statements	7 years

Procedure

Each employee or volunteer has an obligation to contact the Executive Director of a potential or actual litigation, external audit, investigation or similar proceeding involving Cottage Cove that may have an impact as well on the approved records retention schedule.