

Bowie State University Document Retention Policy and Procedures

Purpose

This policy is established to ensure that the records of the **BSU Foundation** are retained as required by law and /or for a period of time deemed to be sufficient given the content and purpose of the record. “Records” includes all forms of communications or information relating to the **Foundation** and its business which have been reduced to “hardcopy” such as paper or film or which can be retrieved from electronic media. Records shall include all incoming and outgoing records as well as drafts, notes, calendars and personal records relating to Foundation business.

Failure to retain records as required by law could subject employees and the **Foundation** to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the **Foundation** in contempt of court, or seriously disadvantage the **Foundation** in litigation.

The **Foundation** expects all employees and other persons who generate and access **Foundation** records to fully comply with this policy. In addition, if an employee or other person believes or is informed by the **Foundation**, that **Foundation** records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then those records must be preserved until the **Foundation** in-house or outside legal counsel determines the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records.

Retention time periods are noted below unless needed for a longer period of time due to audit requirements or litigation:

Institutional and Legal Records:

- Articles of Incorporation; by-laws; Annual Reports- Permanently
- Minutes of Director and Director Committee Meetings – Permanently
- Copyright and Trademark Registration – Permanently
- Contracts (including agreements with investment managers) and Leases –
While active plus 7 years
- Deeds and Titles – Permanently
- Licenses – While active plus 7 years

Federal and State Tax Records (retained in files within **BSUF** office unless noted below)

Form 990, Form 990T and State Support – 7 years
IRS Exemption Application and Determination Letter – Permanently
Private Letter Rulings, and Revenue Agent's Reports – Permanently
IRS Audit Files – 7 years
Trust Returns for which **BSUF** is trustee – 7 years
Unclaimed Property Reports – Permanently

Litigation Records

Claims – While active plus 2 years
Court Documents and Records – While active plus 2 years
Disposition Records – While active plus 2 years
Discover Materials – While active plus 2 years
Litigation Files – While active plus 2 years
Records relevant to pending or threatened litigation should be retained until
Litigation is resolved or threat of litigation gone.

Capital Property Records

Inventory – While active plus 7 years
Property Records including motor vehicle records – While active 7 years
Depreciation Schedules – While active plus 7 years
Property Improvement Records – While active plus 7 years
Sales – 7 years
Tax Exemption Records – Life of Property plus 7 years
Mortgage, Bonds, and Other Long Term Debt Records – While active plus
7 years
Memorandums of Understanding with Donors – Permanently

Bank Records

Bank Reconciliations and support, bank statements, deposit records, wire
transfer records and cancelled checks – 7 years (except for important
payments such as payments for purchase of significant property or
lawsuit settlements) which should be retained permanently)

Insurance (insurance broker retains)

Property Insurance Policies – Life of Policy
Liability Insurance Policies – Life of Policy
Insurance Claim Documents – Settlement plus 7 years

Payroll - Records

Individual Employee Files
Wage and Salary History – 7 years
Salary or Current Rate of Pay – 7 years
Payroll Deductions – 7 years

Time Sheets – 7 years
W-2 Form – 7 years
W-4 Form – 7 years
Garnishments – While active plus 7 years

Other

Bi-weekly payroll registers – 7 years
Payroll reports to Federal, State and Municipal Agencies – 7 years
Payroll Journal Entries - 7 years after final payment
Unclaimed Salaries and Wages – until required to be reported to State
Notice of Unemployment Claims – 7 years

Employment

Job Announcements and Advertisements – 1 year
Applicants Not Hired
 Applications or Resumes – 1 year
Applicants Who are Hired
 Applications or Resumes – While active plus 7 years
 Background investigations Results (summary letter from contractor
 for current employees and report for new hires) – While active
 plus 7 years
 Letters of Recommendations – While active plus 7 years
General Files (*after expiration*)
 Pension Plans – 7 years
 Retirement Plans – 7 years
 Flexible Spending Plans – 7 years
 All other employee benefit plans – 7 years

Personnel Files

Applications and Resumes for Employment – While active plus 7 years
 Unsuccessful – 1 year
 If EEO suit – until resolution
Employment History including performance evaluations, disciplinary
 Warnings and termination or layoff notices – While active plus 7 years
Beneficiary designations – While active plus 7 years
Medical Records – While active plus 7 years

Financial Records – including machine-sensible records that contain sufficient transaction –level detail so that the information and the source documents underlying the machine- sensible records can be identified.

 Description of Accounting System – While active
 General ledgers, subsidiary ledgers and year end trial balance – Permanently
 Journal Vouchers and Backup – While active plus 7 years
 Account Reconciliations – While active plus 7 years
 Annual Audits – Permanently
 Audit Reports and Work Papers – While active plus 7 years
 Accounts Payable ledgers and schedules, vouchers for payments and voucher

Registers and checks – 7 years
Accounts/Notes Receivable ledgers and schedules – 7 years
Quarterly Unitized Bank Report – 7 years

Revenue Records

Contributions, Grant and Non Gift Records – all documents supporting the transaction such as donor correspondence except for credit card information – 7 years
Credit Card Information – data is retained for maximum of three months and then shredded.
Subsidiary Ledgers and Posting Reports – 7 years

Investment Records

All reports received from investment managers relating to investment performance, firm operations and market valuations – 7 years
Monitoring Records – 7 years

Accounts Payable Records

Processed and Paid Disbursement and Expense Reimbursement Requests – 7 years
Subsidiary Ledgers and Posting Reports – 7 years
Check Preparation Reports – 7 years
1099 and 1042 Reports – 7 years
Check Register – 7 years

Paper or Electronic Correspondence

General/Routine – Screen annually and destroy that material for which no further reference is required. At the end of 2 years all e-mails will be automatically deleted unless noted to be saved. However, employees should periodically review e-mail folder for deletion.
Legal – see litigation
Investment – see investment

Voice mails should be deleted as soon as receiver responds to caller or matter Resolved which ever is later.

Internal Audit

Reports and Responses – 7 years

Retention

BSU Foundation usually retains the most recent two years worth of accounting and payroll documents at **BSU Foundation's** business office. Documents older than two years are usually archived in an off site facility. (**Currently Iron Mountain, Jessup, MD**) However, documents older than two years may be retained on site. All other documents are retained on site.

Back-ups are performed nightly by **BSU** Information Technology. The nightly tapes are kept in a safe on site. One set of tapes is rotated off site weekly, per **BSU** policy. These tapes include all activity through Timeline as well as word and excel documents that are on all drives but A: and C:

Employees should consult with CFO prior to destroying any record not identified above.

Disposal

The CFO is responsible for oversight and approval for the retention and final disposition of records.

(a) A record shall be made of all disposed documents and filed in the **BSU Foundation** fire proof safe. The record shall identify the type of record destroyed, the subject matter (if applicable), and the date and method of disposal and the initials of the persons who disposed.

(b) Any document containing the personal information of **Foundation** employees, vendors, or donors is secured and maintained in locked cabinets and shall be shredded when disposition occurs to prevent the document from causing harm to the person (i.e. identity theft and employee privacy).

(c) The **Foundation** will have an annual “clean-up” day during which employees shall dedicate their efforts to document storage and disposal in compliance with this policy.

Privacy

Many records subject to record retention requirements contain confidential information. For example, medical records of employees must be stored separately. Employee background reports must be stored separately in the custody of General Counsel's Office.

Compliance

The Chief Audit Executive shall periodically audit to ensure compliance.

Approved by Audit Committee: _____