SCSU Foundation, Inc.

DOCUMENT RETENTION POLICY

This policy is established to ensure that the records of the Southern Connecticut State University Foundation (hereafter the "Foundation") are retained as required by law and/or for a period of time period 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, other than e-mail, which is governed by University policy. 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 Chairman of Board and Chairs of 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
Files should be retained in fire proof cabinet

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

Form 990, Form 990T and State returns with attachments – Permanently Form 990, Form 990T and State Support – 7 years IRS Exemption Application and Determination Letter – Permanently Private Letter Rulings, and Revenue Agent's Report – Permanently IRS Audit Files – 7 years Trust Returns for which SCSUF 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
Deposition 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 plus 7 years
Deprecation Schedules – 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 (in fire proof safe)

Bank Records

Bank Reconciliations and support, bank statement, 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

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

Payroll Records (if applicable)

Payroll reports to Federal, State and Municipal Agencies – 7 years

Employment (if applicable)

Applicants Not Hired
Applications or Resumes – 1 years
Applicants Who are Hired
Applications or Resumes – 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 Audit - 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

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 Request – 7 years Subsidiary Ledgers and Posting Reports – 7 years Check Preparation Reports – 7 years 1099 Reports – 7 years Check Register – 7 years

Retention

SCSUF usually retains all accounting records and documents in the business office. Documents older than two years can be archived in an off site facility. However, documents older than two years may be retained on site. All other documents are retained on site.

Back-ups are performed nightly by SCSU Information Technology for shared networks with the University. The nightly tapes are kept in a safe on site. These backups included all activity through Banner as well as word and excel documents that are on all drives but A: and C:

Back-ups for the financial software Financial Edge are performed off site by Blackbaud, but may be accessed with prior notification. Back-ups are performed nightly, weekly, and monthly.

Employees should consult with Executive Director or Business Manager prior to destroying any record not identified above.

<u>Disposal:</u> The Executive Director 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 an SCSUF fire proof cabinet. 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 the material.
- (b) Vendors or donors information 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 the policy.

Compliance

The Foundation's auditors shall randomly audit this policy to ensure compliance with statutes.