

Record Retention and Document Destruction Policy Northwest Hydroelectric Association (NWAH)

Purpose

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by **NWAH** in connection with the transaction of association business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate **NWAH** operations by promoting efficiency and freeing up valuable storage space.

Document Retention

NWAH follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

Corporate Records

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Agenda and Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
Certificate of tax exemption - --state(s)	Permanent
Correspondence with IRS regarding tax status	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Contracts (after expiration)	7 years
Correspondence (general)	3 years
Charitable Registration filings	3 years

Accounting and Corporate Tax Records

Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
IRS Form 990, 990-T Annual Returns	Permanent
General Ledgers	[7 years/Permanent]
Business Expense Records	7 years
IRS Forms 1099	7 years
Journal Entries	7 years
Invoices	7 years
Sales Records	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

Bank Records

Check Registers	[7 years/Permanent]
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years

Payroll and Employment Tax Records

Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	7 years
W-2 Statements	7 years
1099 Statements	7 years

Employee Records

Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Personnel File	7 years after termination
Accident Reports and Worker's Compensation Records	7 years
Time worked records	7 years
Employment Applications (unsuccessful candidates)	1 year
I-9 Forms	3 years after termination
Personnel policies, superseded	7 years
COBRA Notices	3 years post termination

Donor and Grant Records

Donor Records and Acknowledgment Letters	7 years
Grant Applications/Proposals and Contracts	7 years after completion
Grant reports, correspondence with funders	7 years after completion
Gift Agreements and records of restricted gifts	Permanent
Gift Instrument where donor makes a deferred gift	Permanent

Legal, Insurance, and Safety Records

Appraisals	Permanent
Copyright Registrations	Permanent
Environmental Studies	Permanent
Insurance Policies	Permanent
Real Estate Documents	Permanent
Deeds on real property	Until property disposed of
Trademark Registrations	Permanent
Leases	6 years after expiration
OSHA Documents	5 years
General Contracts	6 years after termination

Communications

Annual reports	3 years
Press releases	Permanent

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

Emergency Planning

NWHA's records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping **NWHA** operating in an emergency will be duplicated or backed up at least every week.

Document Destruction

NWHA's Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against **NWHA** and its employees and possible disciplinary action against responsible individuals. The Executive Director and Treasurer will periodically review these procedures with the General Counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.

Approved by the NWHA Board of Directors on January 9th, 2025