# SEPTEMBER 11TH NATIONAL MEMORIAL TRAIL ALLIANCE

## Document Retention and Destruction Policy

**Adopted by the Board of Directors:** October 23, 2026 **Authority:** Bylaws Article VIII.

This Policy is adopted by the Board under Article VIII of the Bylaws and may be amended by the Board without amending the Bylaws. Where this Policy conflicts with the Bylaws, the Bylaws control.

### 1. Purpose

This Policy governs the retention and destruction of the Alliance's records to ensure legal and tax compliance, preserve important corporate history, and dispose of records no longer needed in an orderly and secure way. It applies to all records the Alliance creates or receives, in paper or electronic form, including email.

### 2. Retention Schedule

The Alliance retains records for at least the periods below. Where a grant, contract, or law requires a longer period, the longer period controls.

| Record type | Minimum retention |
|---|---|
| Articles of Incorporation, Bylaws, Board and committee minutes, policies | Permanent |
| IRS determination letter, Forms 1023/990, tax-exempt records | Permanent |
| Annual financial statements and audit reports | Permanent |
| General ledgers and year-end financial records | 7 years |
| Bank statements, reconciliations, invoices, expense records | 7 years |
| Contracts and grant agreements | 7 years after expiration or completion |
| Grant records and reports | Term of grant + 7 years (or as the grant requires) |
| Payroll records and tax filings | 7 years |
| Personnel records | 7 years after separation |
| Donor and gift records, acknowledgments | 7 years |
| Insurance policies | Permanent (or life of policy + 7 years) |

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|---|---|
| Real-property and title records | Permanent |
| Routine correspondence and email | Per its content and the categories above |

## 3. Electronic Records and Backups

Electronic records are retained on the same schedule as their paper equivalents. The Alliance maintains reasonable backups and reasonable safeguards for the security and integrity of electronic records.

## 4. Litigation Hold

If litigation, an investigation, or an audit is pending or reasonably anticipated, **all destruction of relevant records stops immediately** and does not resume until the Treasurer or legal counsel confirms the matter is closed. Knowingly destroying records to obstruct a proceeding is prohibited and unlawful.

## 5. Destruction

Records that have met their retention period and are not subject to a litigation hold are destroyed securely — paper by shredding, electronic by deletion or media destruction — in a manner appropriate to their sensitivity.

## 6. Administration and Review

The Secretary and Treasurer administer this Policy. The Governance Committee reviews it at least annually and recommends updates.