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## Heaven-Sent Community Services and Veterans Assistance, Inc.

### Records Retention and Destruction Policy

#### 1. Purpose

The Records Retention and Destruction Policy (“Policy”) establishes how Heaven-Sent Community Services and Veterans Assistance, Inc. (“Heaven-Sent” or the “Organization”) creates, maintains, protects, and disposes of its records. The purpose is to:

- Comply with legal, regulatory, and grantor requirements.
- Protect confidential and sensitive information.
- Ensure important records are available when needed for operations, audits, and reporting.
- Dispose of records in a secure, timely, and cost-effective manner.

#### 2. Scope

This Policy applies to all records created, received, or maintained by Heaven-Sent, regardless of format (paper, electronic, audio, etc.), including but not limited to:

- Governance and corporate records.
- Financial and accounting records.
- Grant and contract records.
- Personnel and volunteer records.
- Program and client service records.
- Communications and administrative records.

#### 3. Responsibilities

- The Board of Directors oversees this Policy and may delegate implementation to the Executive Director or a designated Records Officer.



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- Management is responsible for ensuring that staff and volunteers understand and follow this Policy.
- All staff and volunteers are responsible for managing the records they create or handle in accordance with this Policy.

#### **4. General Principles**

- Records are kept only as long as needed to meet legal, regulatory, funder, and operational needs.
- When a record is covered by more than one requirement, the longest applicable retention period applies.
- Records subject to an audit, investigation, or litigation hold must not be destroyed until the hold is lifted, even if the normal retention period has expired.
- Confidential and sensitive records are stored and destroyed securely.

#### **5. Retention Schedule (Summary)**

The following is a general guide; specific grant or contract terms may require longer retention. “Years” means years after the end of the fiscal year, grant, or relationship, as noted.

##### **A. Corporate and Governance Records**

- Articles of Incorporation, Bylaws, IRS determination letters, and amendments:  
Permanent
- Board and Board committee minutes; Board resolutions: Permanent
- Policies adopted by the Board: Permanent
- Key legal documents (e.g., major MOUs, property deeds, long-term leases):  
Permanent or as long as in effect plus 7 years



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## **B. Financial and Accounting Records**

- Annual financial statements, audits, Form 990 filings: Permanent
- General ledger, chart of accounts: Permanent
- Bank statements, canceled checks, deposit records, bank reconciliations: 7 years
- Accounts payable and receivable ledgers, invoices, expense reports: 7 years
- Payroll records, timesheets, Time and Effort documentation: 7 years
- Budgets and budget revisions: 7 years
- Supporting documentation for federal and state awards (financial and programmatic): At least 7 years after final report and closeout, or longer if required by the award

## **C. Grant and Contract Records**

- Grant and contract agreements, including amendments: At least 7 years after final payment and closeout or longer if required
- Grant applications and proposals (funded and unfunded), correspondence with funders: 3–7 years, or as required by funder
- Performance and financial reports submitted to funders: 7 years

## **D. Personnel and Volunteer Records**

- Employee personnel files (including applications, performance reviews, discipline): 7 years after termination
- I-9 forms: As required by law (generally the longer of 3 years after hire or 1 year after termination)
- Volunteer applications and agreements: 3 years after last service
- Records of workplace accidents or injuries: As required by law (often minimum 5 years)



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## **E. Program and Client Service Records**

- Client/service recipient records (case files, assessments, service plans): Retain in accordance with legal, funder, and ethical standards; generally no less than 7 years after last contact, unless a longer period is required.
- Program statistics and outcome reports (non-identifiable): 7 years or longer if useful for trend analysis and reporting.

## **F. Administrative and Communications Records**

- Routine correspondence and emails (non-legal, non-financial): Typically 2–3 years, unless needed longer.
- Policies and procedures drafts (superseded versions): 3 years after superseded, unless needed for reference.

Specific retention periods may be further detailed in an internal schedule or procedure document.

## **6. Storage, Security, and Access**

- Records containing confidential or sensitive information, such as client data, Social Security numbers, financial account numbers, or health information, are stored securely with access limited to authorized personnel.
- Electronic records are protected by passwords, user permissions, and other security measures.
- Backups of critical electronic records are made regularly and stored securely.

## **7. Destruction of Records**

When records have reached the end of their retention period and are not subject to an audit, investigation, or litigation hold, they should be destroyed in a secure manner:



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- Paper records containing confidential or sensitive information are shredded or otherwise destroyed so they cannot be read or reconstructed.
- Electronic records are deleted in a way that reasonably protects against unauthorized recovery (e.g., secure deletion, destruction of media, or equivalent methods).

Destruction may be documented (e.g., by a log or certificate of destruction) for significant batches of records.

## **8. Litigation and Audit Holds**

If Heaven-Sent becomes aware of a legal claim, investigation, audit, or other matter that may require records, management will issue a “hold” notice. Records related to the matter must not be destroyed, even if the normal retention period has expired, until the hold is lifted in writing by management.

## **9. Policy Review and Updates**

This Policy will be reviewed periodically by management and the Board and updated as necessary to reflect changes in laws, regulations, funder requirements, or organizational needs. Any revisions must be approved by the Board of Directors.

**Adopted by the Board of Directors of Heaven-Sent Community Services and Veterans Assistance, Inc. on the 8th day of January, 2026.**