1. 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 the Idaho State University Foundation in connection with the transaction of Foundation 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 the Idaho State University Foundation’s operations by promoting efficiency and freeing up valuable storage space.

2. Document Retention

The Idaho State University Foundation 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.

a. Corporate Records

- Annual Reports to Secretary of State/Attorney General Permanent
- Articles of Incorporation Permanent
- Board Meeting and Board Committee Minutes Permanent
- Board Policies/Resolutions Permanent
- Bylaws 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

b. Accounting and Corporate Tax Records

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

c. Bank Records

Check Registers  7 years
Bank Deposit Slips  7 years
Bank Statements and Reconciliation  7 years
Electronic Fund Transfer Documents  7 years

d. Donor and Endowment Records

Donor Records and Acknowledgment Letters  7 years
Endowment Contracts and Documentation  Permanent

e. Legal, Insurance, and Safety Records

Appraisals  Permanent
Environmental Studies  Permanent
Insurance Policies  Permanent
Real Estate Documents  Permanent
Leases  6 years after expiration
General Contracts  3 years after termination

3. 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 should be tested on a regular basis.

4. Emergency Planning

The Idaho State University Foundation’s records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the Idaho State University Foundation operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

5. Document Destruction

The Idaho State University Foundation’s Finance 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.

a. 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.

6. Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Idaho State University Foundation and its employees and possible disciplinary action against responsible individuals. The Finance Director and audit committee chair will periodically review these procedures with legal counsel and the Foundation’s certified public accountant to ensure that they are in compliance with new or revised regulations.

Date of Board Approval: October 17, 2008

Person responsible for the periodic review of policy and submitting proposed revisions to the Board for approval: Finance Director

Date of Last Review