



## A. Document Retention Policy

### 1. Objective

The Objective of this policy is to establish a records retention program for SOME. Under this program, SOME's records will be retained for at least the minimum period as stated in applicable state or federal law or regulations. Additionally, destruction of records shall take place pursuant to this standard policy which has been developed for business reasons so that it cannot be said that the organization deliberately destroyed records in anticipation of a specific problem.

### 2. Record Retention Guideline

If a suit is filed against SOME, all records relevant to that pending lawsuit must be retained until the end of that lawsuit. Additionally, records must never be discarded with the intention of covering up information which is adverse to the interest of SOME. Otherwise, records should be discarded after the expiration of the following retention periods:

*Title VII Civil Rights Act of 1964*

*American with Disabilities Act*

#### a. Personal Records

- (1) Personnel and employment records dealing with hiring, promotion, demotion, transfer, layoff or termination, rates of pay or other terms of compensation, and selection for training or apprenticeship.

Retention period: 1 year after the date of making the record or taking the personnel action involved, whichever is later. In the case of an involuntary termination, 1 year after date of termination.

- (2) EEO-1 Report- Employer Information Report

Retention Period: Retain current copy, which is filled with the Equal Employment Opportunity Commission, for 1 year.

*Age Discrimination in Employment Act of 1967*

- (3) Employee payroll and other records containing the following information: name, address, date of birth, occupation, rate of pay, and compensation earned each week.

Retention period: 3 years

- (4) Records and documents, when made in the regular course of business, related to the following:

(a) Job applications, resumes, or any other form of employment inquiry whenever submitted to the employer in response to an advertisement or other notice of existing or anticipated job openings; including records pertaining to the refusal to hire any individual;

(b) Job order submitted by SOME to an employment agency or union for recruitment;

(c) Test papers completed by applicants and candidates for any position which discloses the results of any employer-administered aptitude or other employments test;

(d) Results of physical examinations; and

(e) Any advertisements or notices to the public or to employees relating to job openings, promotions, training programs, or opportunities for overtime work.

Retention period: 1 year from the date of personnel action to which the record relates.

- (5) Written employee benefit plans, such as pension and insurance plans, and any seniority systems and merit systems.

Retention period: 7 years after filing Form 5500

*Equal Pay Act*

- (6) Documents related to payment of wages, wage rates, job evaluations, merit and incentive systems, and seniority systems, including records of any practices that explain the basis for payment of wage differentials.

*Fair Labor Standards Act*

- (7) The following payroll records for each "nonexempt" employee:

- (a) Full name and social security number;
  - (b) Home address;
  - (c) Date of birth;
  - (d) Sex and occupation;
  - (e) Workweek (showing the time of day and days of week on which the employee's workweek begins and the length of each work period);
  - (f) Hours worked for each day;
  - (g) Basis on which employee's wages are paid (current minimum wage times the number of hours worked")
  - (h) Regular rate of pay;
  - (i) Total daily or weekly straight-time earnings;
  - (j) Total weekly overtime compensation;
  - (k) Total wages paid in each pay period;
  - (l) Deductions and additions from wages paid each pay period (including dates, amounts and nature of items added or deducted);  
and
  - (m) The date of each payment of compensation and the pay period covered by such a payment.  
Retention period: 3 years
- (8) For "exempt" employees: payroll records that establish the basis on which wages were paid in sufficient detail so as to permit calculation for each pay period of exempt employee's total compensation, including fringe benefits and perquisites
- (9) Supplementary payroll records, including:
- (a) Basic employment and earnings records (e.g. time cards, time sheets, or production cards);

- (b) Wage-rate tables or schedule which provide the piece rates or other rate used on computing straight-time earnings, wages, salary, and over-time pay;
- (c) Work-time schedules (including notices, company letters, and office memoranda that establish the hours and days of employment of individual workers or groups of workers); and
- (d) Records of additions to or deductions from wages paid ( including all records used by SOME in determining the original cost, the operating and maintenance cost, and any depreciation and interest charges, if such cost or charges are involved in the additions to or deductions from the wages paid)  
Retention period: 2 years

*Employee Retirement Income Security Act of 1974*

(10) ERISA related records including, the following:

- (a) Copies of all reports and backup materials filed with the Internal Revenue Services, Department of Labor or other entity;
- (b) Current information on all plan participates and beneficiaries, including:
  - i. Names and addresses;
  - ii. Employee social security numbers;
  - iii. Dates of birth;
  - iv. Dates of eligibility and participation;
  - v. Vesting dates;
  - vi. Termination dates;
  - vii. Compensation;
  - viii. Insurance (both face amount and cash value);
  - ix. Deferral elections (if any);

- x. Investment options chosen (if any);
- xi. Financial transactions (if any);
- xii. Beneficiary elections (if any); and
- xiii. Dates of statements and relevant time periods;

(c) Dates of termination and reason for departure (for example, termination of employment, job elimination, disability retirement, early or normal retirement, or death);

(d) Dates of rehire for those employees who returned to work;

(e) Determination of employee's eligibility to participate, including entry date, vesting dates and years of service;

(f) Hours worked by participants (used to calculate vesting);

(g) Compensation of all employees (used to determine allocations and to test for nondiscrimination);

(h) Compensation of family members (who work for the organization) of highly compensated employees; and

(i) Deferrals or matching contributions made on behalf of employees participating in 401 (k) plans

Retention period: 7 years

(j) Form 5500 Retention period: 6 years after filing, for a total of 8 years

(11) Records related to leaves and request for leaves under the Family Medical Leave Act of 1993 (FMLA), including records related to the following;

(a) Basic payroll and employee data, including total compensation paid;

(b) Dates on which FMLA leaves were taken;

- (c) Hours of leave taken if leave was taken in increments of less than a day;
- (d) Copies of all notices furnished by or to the employees;
- (e) Documents describing employee benefits or employer policies and practices regarding paid and unpaid leaves;
- (f) Premium payments of employee benefits; and
- (g) Any disputes regarding FMLA leaves

Retention period: 3 years after employee's request for leave

*Immigration Reform and Control Act of 1986*

b. Employment Verification (I-9)

- (1) Retention period: The longer of the following periods: (1) 3 years from date of hiring employee; or (2) 1 year after termination of employee's employment
- (2) Records that: a) prove the purchase price of real property; b) support the basis of depreciable real property; or c) relate to nontaxable real property exchanges including records related to the old and new properties, the data of acquisitions, a precise description of the property, cost or other measure of basis, the previous owner, how the property was acquired, and the acquisition or construction costs.

Retention period: Entire time property is held plus 4 years

c. Financial Records

- (1) Estimates, projections, planning memos, etc.  
Retention period: 10 years
- (2) Expense accounts, approvals, petty cash records  
Retention period: 10 years
- (3) All ledgers, banking records (including deposit and withdrawal records and bank statements), and checking records (including accounts statements, check register and canceled checks)  
Retention period: 20 years
- (4) Audited financial statements (including balance sheets)

Retention period: Permanently

(5) Insurance

Retention period: 7 years

(6) Time Cards

Retention period: 7 years

(7) Accounts Payable

Retention period: 7 years

(8) Grants

Retention period: 7 years after end of grant

(9) Federal Tax Records

Retention period: Each tax return and its supplementary records must be retained for 7 years after the tax return's filing date.

(10) District of Columbia Tax Records

Retention period: Each tax return and its supplementary documents must be retained for 7 years after the tax return's filing date.

d. Medical Records

(1) Immunization records

Retention period: Permanently

(2) All other medical records

Retention period: If the records are no longer needed for medical reasons, they may be discarded 10 years after the last professional contact with that patient. If the patient is a minor, the records must be retained for 10 years after the patient reaches the age of 10.

e. Dental Records

Retention period: The standard practice in the dental profession in the District of Columbia is to retain dental patient records for 7 years after the last visit of each individual patient. If the patient is a minor, the record is to be retained until 7 years after the patient reaches the age of 18.

f. Client Records ( Excluding Medical and Dental)

Retention period: 3 years

g. Other Records

- (1) Occupational Safety and Health Act (OSHA) Forms 300 ( Log and Summary of Occupational Injuries and Illnesses), 301 (incident reports), and 300A (an annual summary)

Retention period: 5 years

- (2) Employee medical records related to work-related conditions

Retention period: Remainder of employment of employee plus 30 years