

## ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS

### DOCUMENT RETENTION AND DESTRUCTION POLICY

#### **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 Association of American Feed Control Officials (AAFCO) in connection with the transaction of organization 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 AAFCO's operations by promoting efficiency and freeing up valuable storage space.

#### **Document Retention**

AAFCO 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***

Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Association Policies/Resolutions	Permanent
Bylaws	Permanent
Construction Documents	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
Contracts (after expiration)	7 years
Correspondence (general)	3 years

#### ***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 Form 1099	7 years

Procedures Manual – Board Permanent Policy No. 3

Journal Entries	7 years
Invoices	7 years
Cash Receipts	3 years
Credit Card Receipts	3 years
<b><i>Bank Records</i></b>	
Check Registers	[7 years]
Bank Deposit Slips	7 years
Bank Statement and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years
<b><i>Donor and Grant Records</i></b>	
Donor Records and Acknowledgment Letters	7 years
Grant Applications and Contracts	7 years after completion
<b><i>Legal, Insurance, and Safety Records</i></b>	
Copyright Registrations	Permanent
Environmental Studies	Permanent
Insurance Policies	Permanent
Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent
Leases	6 years after expiration
OSHA Documents	5 years
General Contracts	3 years after termination
Annual Board Conflict of Interest documentation	3 years
<b><i>Proficiency Testing Program (in addition to records listed above)</i></b>	
Obsolete Documents (SOPs, Manuals, Policies)	Permanent
Records	
Customer/Participant information	3 years after leaving program
Personnel Code of Conduct	7 years after program services conclude
Personnel Training Records	7 years after program services conclude
Results/Reports of PT Test Items	7 years after results reported

### **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**

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

### **Document Destruction**

AAFCO’s Secretary-Treasurer will destroy documents that have met the required retention period, and will oversee 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 AAFCO and its members and possible disciplinary action against responsible individuals. The President and Secretary-Treasurer will annually review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.

*This policy was adopted at the AAFCO Board meeting held July 30, 2010, in Portland OR, updated and approved on December 5, 2013 and again September 7, 2016. It will remain in effect as a permanent policy of the Board until amended or removed by Board action.*