

COLUMBIA ASSOCIATION, INC.

RECORD RETENTION AND DISPOSAL POLICY

Purpose

The purpose of this Record Retention and Disposal Policy (the “Policy”) is to ensure necessary “records” (as defined below) of the Columbia Association, Inc. (“CA”) are adequately protected and maintained, and to ensure that records no longer needed or of no value are disposed of at the appropriate time.

The law requires CA to maintain certain types of records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject CA to penalties and fines, or charges of destruction of evidence or contempt, cause the loss of legal rights, or significantly impair CA’s ability to defend itself in litigation.

Administration

The Vice President Administrative Services in consultation with the General Counsel shall be responsible for developing, implementing and revising this policy governing the retention and disposal of CA’s records, and may designate others, on an ad hoc basis, to assist in implementing this policy, including the following:

- Identifying and evaluating which records should be retained;
- Publishing an appropriate retention and disposal schedule;
- Monitoring local, state, and federal laws affecting record retention;
- Biannually reviewing the record retention and disposal program;
- Developing a training program for personnel responsible for record storage and maintenance; and
- Monitoring for compliance with the record retention and disposal program.

Applicability

This policy applies to all records generated in the course of CA’s operations, including both originals and reproductions. It also applies to records stored on computer as well as paper records.

To the extent that there are multiple copies of records, either in paper or electronic form, only one copy of each record need be retained. Likewise, if there are multiple drafts of a particular record, only the final record need be retained, unless such drafts reflect a course of communication.

Definition of “Record”

A “record” for purposes of this Policy is any body of information that has been documented from the business activities of CA, whether in written or electronic form. Examples of “records” include: financial data, statements and associated workpapers; analyses; agreements; books; contracts; charts or tables; data; correspondence and communications, which are created, sent or received; diagrams; images; invoices; letters; logs; maps; memoranda; opinions; plans; projections; statements; studies; and vouchers. Examples of what may not be “records” for

purposes of this Policy are: (a) superseded drafts of documents, including memoranda, financial statements or regulatory filings; (b) notes on superseded drafts of memoranda, financial statements or regulatory filings that reflect incomplete or preliminary thinking; (c) previous versions of workpapers that have been corrected for clerical or typographical errors or errors due to training of new employees; or (d) duplicates of documents.

A “record” may exist in various forms, including printed, electronic or recorded format (for example, letters, e-mail messages, text messages and voice-mail messages). “Records” stored electronically include records that are stored using equipment located at CA facilities or records that relate in any way to CA business operations that are stored on other devices (whether or not owned by CA) such as: mobile/smart phones; tablets; laptops or other personal computers; and other similar personal communication devices. By way of example and not in limitation of the foregoing, the term “record” includes all copies of records made to enable CA personnel to work outside CA’s offices.

Retention Periods

From time to time CA will establish retention or disposal schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Appropriate retention periods for specific categories of documents are identified in Appendix I attached hereto.

Implementation

For purposes of implementing this policy, CA’s organizational structure is segmented into five departments and four offices as follows:

- Department of Administrative Services
- Department of Communications and Marketing
- Department of Community Services
- Department of Open Space and Facility Services
- Department of Sport and Fitness
- Office of General Counsel
- Office of Audit and Advisory Services
- Office of Planning and Community Affairs
- Office of President

Biannually, commencing in June 2017, each department and office will review the list of documents set forth in Appendix I, Section A of this Record Retention and Disposal Policy. To the extent that a department or office uses and maintains records specific to its operations that are listed in Appendix I, Section B, that department or office also will review those document lists. Each department and office in reviewing those lists will determine whether the identified categories of documents are still accurate, whether new categories must be added or existing categories deleted, and whether any changes should be made in the stated retention periods.

Requests to add or delete identified documents, change retention periods or deviate from specified retention periods must be made to the Vice President Administrative Services and the General Counsel and may be implemented only after both have given written approval.

Disposal of Records

Generally, records may be disposed of in accordance with the schedule reflected in Appendix I. However, in the event of a governmental audit, investigation, or pending litigation, record disposal may be suspended at the written direction of the Vice President Administrative Services or General Counsel. In addition, the Vice President Administrative Services or General Counsel should be informed of any situation that might give rise to legal action as soon as the situation becomes apparent. Record disposal after any suspension shall be resumed only at the written direction of CA's General Counsel.

Electronic Media Management

With respect to CA's electronic media management, in addition to the provisions of this policy, please refer to the following CA information technology (IT) policies: Email Policy, Data Classification and Handling Policy, and Security Roles and Responsibilities. These IT policies may be found at:

https://sites.google.com/a/columbiaassociation.org/information_technology/policies-and-procedures/emailpolicy

https://sites.google.com/a/columbiaassociation.org/information_technology/policies-and-procedures/dataclassificationsandhandlingpolicy

https://sites.google.com/a/columbiaassociation.org/information_technology/policies-and-procedures/datasecurityrolesandresponsibilitiespolicy

Compliance

Each department will ensure that its team members are fully informed of this policy and confirm that they agree to comply with this policy. Team members must be informed that any question regarding this policy is to be directed to the Vice President Administrative Services or the General Counsel.

Approved by the CA Board of Directors on October 26, 2006

Revised 2/20/2014, 6/29/2015, 5/27/2020, 12/9/2020

Appendix I

A. Documents Maintained by Multiple Departments	Retention Period
Accident Reports/Claims (Settled Cases)	5 Years
Archive of All Website Content	7 Years
Board Committee Agendas and Backup Materials	10 Years
Board of Directors Agendas and Backup Materials	10 Years
Check copy and supporting documentation (electronic)	7 Years
Community Surveys	10 Years
Corporate Minutes (Board Committees and Advisory Committees)	10 Years
Corporate Minutes (Board of Directors)	Permanently
Correspondence, General and Schedules; Routine with Customers/Vendors (electronic)	3 Years
Correspondence, Legal and Important Letters	Permanently
Deeds, Easements, Mortgages and Bills of Sale	Permanently
Depreciation Schedules (electronic – Lawson)	Permanently
Duplicate Deposit Slips	7 Years
Emergency Action Plans	10 Years
Employee Personnel Records	Duration of employment plus 5 Years
Employment Applications (non-hires)	1 Year
Final Long-Term Plans and Studies (e.g., ADA, Aquatics, Older Adult, etc.)	Permanently
General Liability Incident Reports – Adults	3 Years
General Liability Incident Reports – Children	3 Years after child turns 21
Immigration Matters	The longer of: (i) entire term of employment plus 1 Year, or (ii) 3 Years
Invention/Innovation Journals (or any other Documents or Information Evidencing Creation, Modification or Ownership of Intellectual Properties or other Company Property)	Permanently
Investigative Reports	7 Years
Non Procurement Contracts, Leases and Licenses	Duration plus 7 Years
Payroll Records, Summaries and Tax Returns	7 Years
Procurement Contracts	Duration plus 7 Years
Program Registrations (e.g., for SAS, Camps, Dog Park, etc.)	Length of Enrollment plus 3 Years

A. Documents Maintained by Multiple Departments	Retention Period
Property Records, Including Costs, Depreciation Reserves, Year-End Trial Balances, Depreciation Schedules, Blueprints, and Plans	Permanently
Purchase Orders	3 Years
Receiving Sheets	3 Years
Recordings of Board of Directors and Board Committee Meetings	4 Years
Rental/Events Agreements	3 Years
Retirement and Pension Records	Permanently
Safety Records	7 Years
Sales Records	7 Years
Timesheets (electronic)	7 Years
Trademark Registrations, Patent Letters, and Copyright Registrations	Permanently

B. Documents Specific to One Department/Office	Retention Period
1. Department of Administrative Services	
Accounts Payable Ledgers and Schedules; Audit Schedules (electronic)	7 Years
Accounts Receivable Ledgers and Schedules (electronic)	7 Years
Audit Reports, includes Financial Statements (External)	Permanently
Bank Reconciliations	7 Years
Bank Statements (some electronic, e.g. Bank of America)	7 Years
Bond Issuances and Ledgers, Transfer Registers, Stubs Showing Bond Issuances, Debt Issuances, Etc.	Permanently
Budgets	10 Years
Charts of Accounts (electronic)	Permanently
Checks – electronic (Cancelled Except those Noted Above)	7 Years
Checks (Cancelled Checks for Important Payments, Special Contracts) - Checks Should be Filed with the Papers Pertaining to the Underlying Transaction	Length for which underlying transaction documents must be retained
Financial Reports – Fourth Quarter	10 Years
Financial Statements (Year-end, Other Months Optional) –electronic	7 Years
General Ledgers, Year-End Trial Balances (electronic)	Permanently
Insurance Records, Policies, etc.	Permanently

B. Documents Specific to One Department/Office	Retention Period
Invoices to Customers or from Vendors	7 Years
IRA and Keogh Plan Contributions, Rollovers, Transfers and Distribution	Permanently
Petty Cash Vouchers	7 Years
Stock and Bond Certificates (Cancelled)	7 Years
Subsidiary Ledgers – Electronic	7 Years
Tax Returns, Revenue Agents’ Reports, and other Documents Relating to Determination of Income Tax Liability	7 Years
Vouchers for Payments to Vendors, Employees, etc. (includes Allowances and Reimbursements of Employees, Officers, etc., for Travel and Entertainment Expenses)	7 Years
2. Department of Communications and Marketing	
Activities Guides	Permanently
Advertisements (Digital, Print and Direct Mail)	7 Years
Membership Agreements	Duration of Membership plus 3 Years
Press Releases	Permanently
Social Media (Archived Reports, Video, Screen Shots)	Permanently
3. Department of Community Services	
Criminal History Records Information (CHRI), per Criminal Justice Information System requirements	3 years after last date of team member’s employment*
CHRI when employment applicant is not hired	90 days*
*Files will be shredded at end of retention period	
4. Department of Open Space and Facility Services	
As-Built, Construction Specifications and Close Out Documents	Permanently
Asset Construction Drawings	Permanently
Asset Inspection Forms	10 Years
Asset Inventory	Permanently
Deeds	Permanently
Developer Agreements	Permanently
Driver Vehicle Inspection Record	3 Years

B. Documents Specific to One Department/Office	Retention Period
Easements	Permanently
Fuel Records	Permanently
GIS Data	Permanently
Grant Agreements	7 Years
Hazmat Materials Disposal	Permanently
Job Photos	Permanently
Liability Waivers – Dog Park	5 Years
Long-Term Leases	Permanently
Open Space Closings	Permanently
Pesticide Application Records	3 Years
Planting Agreements	Permanently
Project Files	7 Years
Property Survey Data	Permanently
Property Transfers	Permanently
Vehicle and Equipment Repairs/Maintenance	Permanently
Warranties	Until Expired
5. Department of Sport and Fitness	
Inventory Records	7 Years
Liability Waivers for Members	Duration of Membership plus 3 Years
Liability Waivers for Non-Members	5 Years
Medical information, PAR-Q, workout cards	Duration of membership plus 3 Years
6. Office of General Counsel	
Board and Senior Management Ethics Policies Acknowledgments and Financial Disclosure Forms	7 Years
Claim Files (Adult Claimants)	5 Years from Date of Claim
Claim Files (Minor Claimants)	5 Years following date Claimant reaches age 21
Covenant Case Files	10 Years from Village Closing Resolution
Legislative Files	10 Years

B. Documents Specific to One Department/Office	Retention Period
Litigation Files	Duration of Case plus 7 Years
7. Office of Audit and Advisory Services	
Audit Quality Assurance Reviews – External Validations	Permanently
External Audit Workpapers	7 Years
Reports and Supporting Workpapers (Routine Audits and Projects)	7 Years
Reports and Supporting Workpapers (Investigative and Other Special Audits/Projects)	Permanently
Village Community Association Financial Reports and Related Internal Audit Reviews and Communications	10 Years
8. Office of President	
Presidential Search Files	Term of Current President plus 2 Years Before and 2 Years After