



International Institute of Rural Reconstruction

Document Retention Policy

This Document Retention Policy (the “Policy”) establishes guidelines for all employees of the International Institute of Rural Reconstruction (the “Institute”) to ensure that all Institute documents are retained for at least the time period required by applicable law, or longer if the document is needed for operational purposes. Employees of the Institute shall be familiar with the requirements of this Policy and shall maintain or discard Institute documents in conformity with this Policy.

If any unit of the Institute (a) receives a subpoena, document request, civil investigative demand or other form of legal process, (b) has litigation, an investigation or any other proceeding that is pending or reasonably foreseeable, (c) learns of a governmental inquiry relating to that unit or the Institute, or (d) voluntarily cooperates with governmental authorities, document destruction shall be suspended to ensure the preservation of all relevant documents. The scope of the suspension of document destruction shall be determined in consultation with legal counsel.

Papers relating to Dr. Yen’s life and work are preserved in the Archives at Columbia University. No Institute document should be destroyed without first determining whether it is of sufficient interest to merit storage in the archives.

The effective date of the Policy is October 1, 2010.

MINIMUM RETENTION REQUIREMENTS

Based on guidelines provided by the National Council of Nonprofits, the Institute will follow the following minimum retention requirements for the retention of Institute documents. For any document type not listed, the Secretary shall assign a retention period that is necessary to accomplish the Policy's objectives in a cost-efficient and reasonable manner. If required for business operations or any other reason, Institute employees may retain Institute documents beyond the minimum retention requirements provided here.

Type of Document	Requirement Practice	Disposition
Accounts payable ledgers and schedules	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Annual information returns (IRS Forms 990)	Federal law requires that the three most recent years returns be kept in the organization's headquarters office and be made available for public inspection upon request. Keep copies at Headquarters and the U.S. Office (USO).	Store with financial records. Destroy after seven years.
Audited financials and report	Store for all years at Headquarters and USO. Keep most recent three years only at The main New York office of Cleary Gottlieb Steen &* Hamilton LLP (Cleary).	Keep permanently.
Auditors' letters to management	Store for all years at Headquarters and USO. Keep most recent three years only at Cleary.	Keep permanently.

Bank Reconciliations	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after two years.
Bank statements, canceled checks, check registers, investment statements, and related documents	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Checks (for important payments and purchases)	Compile & file records on an ongoing basis in each unit.	Keep permanently.
Contracts, including grant agreements (those in effect)	Compile & file records on an ongoing basis in each unit.	Keep permanently.
Contracts (including grant agreements), mortgages, notes and leases (expired)	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Corporate documents, including articles of incorporation, By-Laws, and related documents	Store in corporate record book at USO. Maintain copies in duplicate books at Headquarters and at Cleary.	Keep permanently.
Correspondence (general)	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after two years.
Correspondence (legal and important matters)	Compile & file records on an ongoing basis in each unit.	Keep permanently.
Correspondence (with customers and vendors)	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after two years.
Deeds, mortgages, and bills of sale	Compile & file records on an ongoing basis in each unit.	Keep permanently.

Depreciation Schedules	Compile & file records on an ongoing basis in each unit.	Keep permanently.
Donor and Gift records	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Duplicate deposit slips	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after two years.
Employment applications	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after three years.
Expense Analyses/expense distribution schedules	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Grant proposals (pending or in process of execution)	Compile & file records on an ongoing basis in each unit.	Keep permanently
Grant proposals (non-current)	Compile & file records on an ongoing basis in each unit.	Store with program records. Destroy after three years.
HR files (current employees)	Compile & file records on an ongoing basis in each unit.	Keep in relevant unit so long as employee is with IIRR.
HR files (terminated employees)	Compile & file records on an ongoing basis in each unit.	Destroy after seven years.
Insurance Policies (expired)	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after three years.

Insurance records, current accident reports, claims, policies, etc.	Compile & file records on an ongoing basis in each unit.	Keep permanently.
Inventories of products, materials, and supplies	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Invoices (to customers, from vendors)	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Meeting/board documents including agendas, minutes and related documents	Store in corporate record book at USO. Maintain copies in duplicate books at Headquarters and at Cleary.	Keep permanently
Payroll records and summaries	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
Retirement and pension records	Compile & file records on an ongoing basis in each unit.	Keep permanently
Tax returns and worksheets	Compile & file records on an ongoing basis in each unit.	Keep permanently
Tax-exemption documents including IRS determination letter, and any related documents	Store in corporate record book at USO. Maintain copies in duplicate books at Headquarters and at Cleary.	Keep permanently
Treasurer's reports, periodic (Blue books)	Compile & file records on yearly basis at Headquarters and USO.	Store with financial records. Destroy after three years.

Withholding tax statements	Compile & file records on an ongoing basis in each unit.	Store with financial records. Destroy after seven years.
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RETENTION PROCEDURES

IDENTIFICATION OF DOCUMENTS SUBJECT TO RETENTION

All employees of the Institute shall identify, in the course of their regular duties, the Institute documents subject to retention under the Policy, including electronic messages and files, and voice mail messages. All employees shall keep any documents necessary for the day-to-day work of the Institute, and all documents that they determine are subject to the minimum retention requirements listed above, in their personal files or in the Institute’s files until the review period discussed below. Any questions any employee has about the retention of any document should be addressed to the Secretary, who shall consult with legal counsel if necessary.

REVIEW AND MANAGEMENT OF RETAINED DOCUMENTS

The Secretary and Treasurer, or their designees, shall be responsible for managing the retention, storage and destruction of Institute records. The Secretary shall establish an annual review period. During such review period all employees shall review their personal files and determine whether they should continue to retain individual documents in their own personal files, whether certain documents should be transferred to the Institute’s central files in one or more units, and whether any documents shall be disposed of in conformance with the Policy.

The Treasurer, or his or her designee, will oversee the retention and storage of all financial documents in the Institute’s central files, including audits, financial statements, and all tax materials. Any such documents that are in the personal files of an employee that the employee believes should be retained in the Institute’s central files shall be reported to the Treasurer during the stated review period.

The Secretary, or his or her designee, will oversee the retention and storage in the Institute's central files of all non-financial records, including minutes of meetings, grant applications, grant agreements and correspondence. Any such documents that are in the personal files of an employee that the employee believes should be retained in the Institute's central files shall be reported to the Treasurer during the stated review period.

The Secretary and Treasurer shall ensure all documents reported to them during the review period are appropriately filed in the Institute's central files or destroyed.

During the review period all employees should also report to the Secretary or Treasurer, or their designees, which documents they determine shall be destroyed in conformance with the Policy. When an employee reports a document to the Secretary or Treasurer and recommends that it be destroyed, if the required storage period has ended, or the Policy does not require retention of the document, the Secretary or Treasurer shall give instructions that the document be destroyed. The Secretary and Treasurer shall make the final determination about whether any documents should be destroyed, and shall consult legal counsel if necessary.