

Records Management Policy

Policy Name	WEF Records Management Policy
Policy Category	Business
Policy Number	2005-003
Policy Origination and Review Dates	October, 2005; August, 2006; July, 2009; July, 2015; July, 2019; September, 2023
Requirements	Sarbannes Oxley Act Requirements
Review Cycle	7 years or earlier if needed
Legal Review Required	Yes

A. General Policy Statement

The primary purpose of the Water Environment Federation® (WEF®) record management policy is to properly identify and preserve specified records, electronic or hardcopy, for an applicable retention period and to eliminate unnecessary retention of records. This policy is reviewed systematically based on the reasonable, legitimate business needs of the WEF and to comply with the legal requirements and government regulations applicable to WEF. Specifically, the WEF records management policy shall meet the criteria listed below.

1. Records vital to the ongoing operation of the business shall be identified and appropriately safeguarded.
2. All records not necessary for legal or business reasons and not required to be retained by law or regulation shall be destroyed in order to reduce the high cost of storing, indexing, and managing the vast amount of documents that would otherwise accumulate and to maximize the performance of computer systems.
3. Destruction of records will comply with the WEF Record Retention Schedule in order to avoid any inference that any document was destroyed in anticipation of a specific problem. The WEF Legal Counsel (“Counsel”), in coordination with appropriate WEF staff, will review and update the WEF Record Retention Schedule. WEF’s Executive Director, or their designee, is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of hard copy financial, personnel-related, or any other sensitive information will be accomplished by shredding; electronic records will be accomplished by purging.
4. Documents that are not otherwise subject to retention for business reasons may need to be retained because of unusual circumstances, such as litigation or a government investigation. If for any reason it is felt that an unusual circumstance exists or arises, WEF’s Counsel shall be

notified as soon as reasonably practical. When litigation or investigations occur, the WEF Executive Director, or their designee, acting on the advice of Counsel will notify the appropriate staff and direct that relevant categories of documents be labeled for retention until further notice.

5. The privacy and security of records shall be appropriately assured and records are to be stored in a safe and secure manner which is accessible only by those who are authorized to do so. Documents and financial files that are essential to keeping the organization operating in an emergency will be duplicated or backed up routinely and maintained off site.
6. WEF Trustees and volunteers are not required to maintain any of the records specified in the Record Retention Schedule as that responsibility will be handled by staff. However, the policy applies to any WEF business records included in the Record Retention Schedule that were acquired by Trustees, volunteers, and staff on all types of storage media, including electronic storage, located in WEF offices, at home, or any other offsite location. Meeting minutes of the Board include all appropriate attachments and upon approval will be posted by WEF staff in a restricted area with controlled access.
7. Electronic documents will be retained as if they were paper documents and are subject to the Record Retention Schedule. If a user has sufficient reason to keep electronic records maintained by an external entity (for example cancelled checks maintained by a bank or other vendor records), the item should be printed to hard copy or an electronic document and stored in accordance with internal processes to achieve the required retention. Backup and recovery methods will be tested on a regular basis.
8. Requests to increase the retention time, or an otherwise exemption to schedules beyond that specified in the Record Retention Schedule, must be justified by staff requesting increased time and approved by the Executive Director, or their designee, in consultation with WEF legal counsel as needed.
9. If those subject to this policy fail to follow it, possible civil and criminal sanctions could result against WEF and staff (or others subject to this policy). This could also trigger staff disciplinary actions.

B. Record Retention Schedule

WEF follows the document retention schedules 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. When there is an unclear determination of the amount of time to retain a document the business record will be retained for 7 years. For WEF staff email, the retention period for email will consist of 2 years in active email folders and any remaining years of the retention period in archived email folders.

General Corporate Records

Item Description	Retention Length
Annual Reports	Permanent
Approved Board meeting minutes and records of all actions taken by Board without a meeting	Permanent
Approved minutes of all delegate members' meetings and records of all actions taken by delegate members without a meeting	Permanent
Articles of Incorporation and amendments thereto	Permanent
Constitution and/or Bylaws	Permanent
Fixed Assets	Permanent
Historical Document (Photographs, etc.)	Permanent
IRS Application for Tax-Exempt Status	Permanent
IRS Determination Letter	Permanent
Patents, trademark registrations, copyright registrations	Permanent
Policies	Permanent
Property records (including leases, deeds, mortgages, easements, rights of way, appraisals, costs, depreciation reserves, blueprints, plans, end-of-year trial balances, tax records)	Permanent
Approved minutes of Committee/Community member meetings and records of actions taken by committee/ community members without a meeting.	5 years
Authorizations for expenditures	7 years
Contracts, generally	Expiration +7 years
Contracts, sales (UCC)	7 years
Correspondence denying liability of the WEF or which the WEF might need to produce in court to disprove liability or to enforce rights of the Association.	3 years after life of principal document it supports
Correspondence relating to member discipline matters	10 years after final resolution of discipline matter or membership termination
Correspondence that constitutes all or part of a contract or that are important in the clarification of certain points in a contract.	3 years after life of principal document it supports
Correspondence to which members or others may make reference for more than a year.	3 years from latest reference to letter
Correspondence, general/routine	3 years

Membership ballots following the applicable vote	3 years
Memorandum of Understanding with other organizations	3 years after life of principal document it supports
Notes (internal reports, memos, etc.)	3 years
Voice Mail	2 Months
Written communication to members	3 years
Membership applications – Active members Paper Form with Credit Card Payment	0 - destroyed after database processing completion
Paper Form with Check Payment	1 year after database processing completion
Membership names and addresses - Active members	Current

Accounting, Finance and Tax Records

Item Description	Retention Length
Auditors' reports and Year End Financial Statements	Permanent
Canceled checks/Proof of payment for important purchases	Permanent
Charts of accounts	Permanent
Depreciation records	Permanent
Income tax returns and filings	Permanent
Banking records, including deposit and withdrawal records, EFT, bank statements and reconciliation, and any other related records	7 years
Budgets	7 years
Employee payroll records (W-2, W-4, annual earnings records, etc.)	3 years
Expense accounts, approvals, petty cash records, sales commission records	7 years
Federal and state tax bills and statements	7 years
Grant Agreements	3 years from closeout report, unless otherwise specified in grant agreement
Inventory lists	7 years
Invoices	7 years
IRS 1099s	7 years
Payroll Journal	3 years
Payroll tax returns	4 years
Sales and use tax returns	4 years
Schedules, ledgers and other supporting documentation for financial statements and tax forms	7 years
Subsidiary ledgers (accounts receivable, accounts payable, etc.)	7 years
Warranty claims/Claims of damage	7 years

Personnel Records and Payroll Documents

Item Description	Retention Length
Payroll Registers	Permanent
Retirement and Pension Plan Documents	Permanent
EEO-1 Reports	3 years
EEO-related documents	Later of 3 years from separation or action date
Employee records relating to the life cycle of employment including, but not limited to, hire, promotion, demotion, disciplinary action, grievances or disputes, discharge, wage rates, performance withholding information, garnishments, FMLA, leave of absence, ADA accommodations, insurance, accident reports, worker's compensation claims.	Employment term, plus 3 years
Government reports other than EEO-1 Reports	5 years
Medical or exposure to toxic substances Documents	30 years
Non-employee job applications, resumes and correspondence	1 year
Records showing employment eligibility under the Immigration Reform and Control Act (I-9)	3 years after date of termination
Social security tax records	7 years
Time cards/sheets	3 years
Unclaimed wages	3 years after report is sent

Insurance

Item Description	Retention Length
Insurance Policies (Non-benefit)	Permanent
Accident Reports	7 years
Benefit Plan Policies	6 years
Unemployment insurance	3 years

Legal

Item Description	Retention Length
Claims and litigation files	Permanent