

**AMERICAN COLLEGE HEALTH ASSOCIATION (ACHA)
BOARD OF DIRECTORS
POLICY AND PROCEDURE
(BOD P/P)**

BOD P/P Number:	2023-1	Date Established: July 19, 2023		
		Date Revised:		
		Date Reviewed:		
Reference:	BOD Meeting	Term:	<input type="checkbox"/>	1 Year
			<input type="checkbox"/>	2 Years
			<input checked="" type="checkbox"/>	Indefinite

BOD P/P Title:	RECORD RETENTION POLICY
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BOD Authority:	ACHA Bylaws, Article VIII, Section 1
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Purpose:	<p>American College Health Association (“ACHA”), as part of its day-to-day operations, and for the benefit of its members and others, creates, receives, and retains documents and records. This policy is intended to:</p> <ul style="list-style-type: none"> (i) Identify the record and document retention responsibility of ACHA’s Board of Directors, officers, and staff (“Personnel”); and (ii) Provide Personnel with procedures to follow with respect to the identification, retention, storage, and disposal of ACHA records and documents created, received, maintained, or managed by ACHA whether in hard copy or electronically stored (“Records”). The term “Records” does not include published information and other materials readily available to the public from sources other than ACHA (e.g., newspapers, vendor brochures, and government regulations). <p>ACHA is committed to the appropriate review, retention, and destruction of Records. Schedule A of this Policy, which is incorporated herein, contains the time periods for which specific types of Records will be kept.</p>
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	<p>This policy is designed to:</p> <ul style="list-style-type: none"> (i) Ensure that all Records necessary for the conduct of ACHA’s operations are available for as long as there is a reasonable need for them; (ii) Ensure that ACHA complies with applicable federal and state legal requirements for retaining Records; (iii) Minimize the costs of Records retention including the costs of storage and retrieval of retained documents; (iv) Eliminate accidental or innocent destruction of Records; and (v) Ensure that Records for which there is no operational or legal reason to continue to keep are disposed of in a proper manner. <p>When Personnel create documents, they should bear in mind that such documents are: (i) subject to this Policy; (ii) are potentially eligible for disclosure if demanded by third parties during the course of administrative actions, litigation, or government investigations; and (iii) in the case of documents sent outside of ACHA, are potentially subject to the record retention policies of any or all of the Records’ recipients and may be turned over by those recipients to other government agencies or private individuals in response to requests, court orders, or subpoenas directed at them.</p>
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<p>Procedure:</p>	<p>Document Retention. ACHA follows the document retention procedures outlined below:</p> <ul style="list-style-type: none"> (i) Records to be retained in our electronic information retention system will, in general, be those reflecting the final resolution or completion of the transaction, task, action, or issue, or the latest version of records from uncompleted transactions; (ii) Records not listed in Schedule A and records not substantially similar to documents listed in Schedule A, will be retained only for the period of their immediate or current use not to exceed one year; (iii) Records listed in Schedule A will be maintained for the length of time indicated, and Records that are not listed but are substantially similar to those listed in Schedule A, will be retained for the same amount of time as those listed in Schedule A, unless a longer period of retention is required due to a contractual or legal requirement; and (iv) No Records will be destroyed or deleted if pertinent to any ongoing governmental investigation or proceeding, or private litigation (if you have questions regarding this provision, contact the ACHA’s Chief Executive Officer). <p>From time to time, Personnel may be required to determine whether Records in their care, custody, or control are still active and needed, or inactive and therefore eligible for retention/destruction pursuant to this Policy. Records are eligible for destruction once the applicable retention periods identified in Schedule A have lapsed. If the retention period has not lapsed or inactive records are still required for business use or subject to a records hold, then prior to their destruction they should continue to be retained for an appropriate length of time based on Schedule A and on their business use, and in the case of a records hold, for at least the duration of the hold. Personnel must not abuse this responsibility or conduct their activities in any manner that would violate or frustrate the purpose of this Policy.</p> <p>From time to time, the ACHA Chief Executive Officer may authorize longer retention periods than expressly provided in this Policy.</p> <p>Hard Copy Records. Paper or hard copy Records will be stored in the designated workspaces of employees and departments of the ACHA national office. Records will not be stored offsite.</p>
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	<p>Electronic Records. Electronic Records will be retained as if they were paper documents. Any electronic files that are described in one of the Records types listed on Schedule A will be maintained for the required time period in the cloud-based storage system designated by ACHA. An electronic reproduction of any document, if available, listed on Schedule A will replace a paper version of the document. Electronic Records should not only be stored locally on individual staff computing hard drives.</p> <p>All Records stored in the cloud-based storage system will be backed up according to the procedures of the service provider engaged by ACHA. ACHA will take reasonable steps to ensure appropriate systems are in place for data backup and recovery.</p> <p>Document Destruction. The ACHA Chief Executive Officer is responsible for the ongoing process of identifying Records that have met the required retention period, overseeing the destruction of Records when applicable, and appropriately documenting categories of Records identified for destruction in accordance with this Policy. Destruction of financial, personnel-related, and confidential documents will be accomplished by shredding. The ACHA Board of Directors reserves the right to designate another responsible role from time to time.</p> <p>Compliance & Amendment. Failure on the part of Personnel to follow this Policy can result in possible civil and criminal sanctions against ACHA and its Personnel, and possible disciplinary action, including termination, against responsible individuals. The ACHA Chief Executive Officer will periodically review this policy with ACHA counsel and external auditors to ensure that it is in compliance with new or revised laws and regulations. ACHA reserves the right to amend, alter, or terminate this policy at any time and for any reason, with Board approval.</p>
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SCHEDULE A
Schedule of Records

Corporate Documents

Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minutes of board meetings	Permanent
Minutes of committee meetings	Permanent
Committee reports	5 Years
Resolutions of board and board committees.....	Permanent
Qualifications to do business.....	Permanent
Policies and procedures	Permanent
Intellectual property records (trademarks, etc.).....	Permanent
Gift and endowment fund records (including relating to establishment, investment, and use of donor-restricted funds)	Permanent
Membership records	7 Years
Independent contractor agreements	7 Years from expiration of contract
Other contracts for services.....	7 Years from expiration of contract
Sponsorship agreements	7 Years from expiration of contract
Articles of Operation (ACHA Sections)	Permanent

Conflicts of interest disclosure recordsPermanent

Reports and Programs

Annual meeting post-conference 7 Years
Annual report – state filings Permanent
Annual report – association activities..... 5 Years
Institutional consultations..... 3 years
National election resultsPermanent
National office report 5 Years
Survey reports and executive summaries 5 Years
Annual meeting programs and compendiums 7 Years

Insurance

Policies, certificates, and related recordsPermanent
Audits or adjustments 7 Years after final adjustment
Claims Files
Workers’ compensation..... 7 Years after later of termination, retirement, or last claim closed
Group insurance. 7 Years after later of termination, retirement, or last claim closed
Third party claims 7 Years after later of settlement date or last activity

Real Estate

Purchase or lease records.....Permanent
Insurance records.....Permanent
Appraisals and blueprintsPermanent
Maintenance and repair records..... 7 Years

Accounting

Authorizations for expenditures 3 Years
Cash batches and receipts 3 Years
Bank records (including bank statements, bank deposit slips, cancelled checks, and electronic fund transfer documents)..... 7 Years
General ledgersPermanent
Investment statements and reports 7 Years
Budgets 7 Years
Inventory records..... 7 Years
Equipment records..... 7 Years
Fixed asset records 7 Years
Internal audits 7 Years
Invoices (to members/customers and from vendors)..... 7 Years
End-of-year financial statements.....Permanent
Depreciation schedules.....Permanent
Audit reports of accountants.....Permanent

Human Resources

Employee accident records..... 7 Years after separation of the employee
from employment
Personnel Files 7 Years after separation of the employee
from employment
Records relating to employment law charges..... 7 Years after separation of the employee
from employment
Internal complaints or compliance records..... 7 Years after separation of the employee

from employment

Form I-9 3 Years after separation of the employee from employment
 Records relating to applicants not hired 3 Years
 Job postings / Advertisements 3 Years
 Garnishments Permanent
 Retirement and pension plan documents Permanent
 Employee Handbook Permanent
 Employee medical records Permanent

Tax

Tax and tax-exemption related records (Rulings, Returns, and IRS and state determination letters)
 Permanent
 Property tax records Permanent
 1099 Forms 7 Years
 Payroll tax records and related records 7 Years
 Unemployment compensation claims and records 7 Years
 W-2 and W-4 Forms 7 Years

Work Product

Email 90 Days
 Website and user records 3 Years
 Publications (including newsletters and press releases) 3 Years
 Documents relating to products and services 3 Years
 Letters relating to the establishing of credit/credit turn-downs 3 Years

Litigation/Legal

Letters or email denying liability Permanent
 Litigation work product 7 Years from close of litigation
 Materials subject to litigation hold 7 Years from close of litigation or hold
 Court orders, judgments, and settlements Permanent

Government Affairs

Lobbying materials including lobbyist reports and registrations 3 Years
 Other correspondence, including testimony, with agencies (state or federal) 7 Years
 Amici curiae briefs Permanent

Research

IRB/Admin approval documents 3 Years from completion
 Research data Permanent
 Grant applications and agreements 5 Years from completion

Miscellaneous

Continuing education: accrediting body applications 7 Years
 Continuing education: program activity files 6 Years from completion

Resources:	National Office	Volunteer
Human:	CEO Staff	ACHA President
Financial:		

Other:	National office designated record storage areas Bowling Green national records archive	
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