

Adopted: October 2016
Reviewed: April 2022
Next Review Date April 2025



701 RECORDS RETENTION

I. PURPOSE

To govern the required length of time the school retains different documents and records.

II. RETENTION SCHEDULE

File Category	Item Retention	Period
Corporate Records	<ul style="list-style-type: none"> • <i>Bylaws and Articles of Incorporation</i> • <i>Corporate resolutions</i> • <i>Board and Committee meeting agendas and minutes</i> • <i>Conflict-of-interest disclosure forms</i> 	<ul style="list-style-type: none"> • Permanent • Permanent • Permanent • 4 years
Finance and Administration	<ul style="list-style-type: none"> • <i>Financial statements (audited)</i> • <i>Auditor management letters</i> • <i>Payroll records</i> • <i>Check register and checks</i> • <i>Bank deposits and statements</i> • <i>Chart of accounts</i> • <i>General ledgers and journals (includes bank reconciliations)</i> • <i>Investment performance reports</i> • <i>Equipment files and maintenance records</i> • <i>Contracts and agreements</i> • <i>Correspondence — general</i> 	<ul style="list-style-type: none"> • Permanent • 7 years • 7 years • 7 years • 7 years • 7 years • 7 years • 7 years • 7 years after disposition • 7 years after all obligations end • 3 years

Insurance Records	<ul style="list-style-type: none"> • <i>Policies — occurrence type</i> • <i>Policies - claims-made type</i> • <i>Accident reports</i> • <i>Safety (OSHA) reports</i> • <i>Claims (after settlement)</i> • <i>Group disability records</i> 	<ul style="list-style-type: none"> • Permanent • Permanent • 7 years • 7 years • 7years • 7years after end of benefits
Real Estate	<ul style="list-style-type: none"> • <i>Deeds</i> • <i>Leases (expired)</i> • <i>Mortgages, security agreements</i> 	<ul style="list-style-type: none"> • Permanent • 7 years after all obligations end • 7 years after all obligations end
Tax	<ul style="list-style-type: none"> • <i>IRS exemption determination and related correspondence</i> • <i>IRS Forms 990</i> • <i>IRS Forms 1023 (Application for Tax Exemption)</i> • <i>IRS Form 5768 (“501H Election”)</i> • <i>Charitable Organizations Registration Statements (filed with Mineesota Attorney General)</i> 	<ul style="list-style-type: none"> • Permanent • Permanent • Permanent • Permanent • 7 years
Human Resources	<ul style="list-style-type: none"> • <i>Employee personnel files</i> • <i>Retirement plan benefits (plan descriptions, plan documents)</i> • <i>Employee handbooks</i> • <i>Workers comp claims (after settlement)</i> • <i>Employee orientation and training materials</i> • <i>Employment applications</i> • <i>IRS Form I-9 (store separate from personnel file)</i> • <i>Withholding tax statements</i> • <i>Timecards</i> 	<ul style="list-style-type: none"> • 7 years after employment ends • Permanent • Permanent • 7 years • 7 years after use ends • 3 years • Greater of 1 year after end of service, or 3 years • 7 years • 3 years

Technology	<ul style="list-style-type: none"> • <i>Software licenses and support agreements</i> 	<ul style="list-style-type: none"> • 7 years after all obligations end
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III. ELECTRONIC DOCUMENTS AND RECORDS

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files 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.

IV. EMERGENCY PLANNING

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

V. DOCUMENT DESTRUCTION

The Executive Director is responsible for the ongoing process of identifying all records which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. The organization will review its documents on file once per year, in the first quarter of the year, and will destroy records and documents that have surpassed their retention period.

Document destruction will be suspended immediately, upon any indication of an official government investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the official government investigation or the resolution of the imminent or filed lawsuit.

VI. COMPLIANCE

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against Spero Academy and its employees and possible disciplinary action against responsible individuals. The Executive Director and the Board Chair will periodically review these procedures with legal counsel or Spero Academy’s certified public accountant to ensure that the procedures are in compliance with new or revised regulations.

Legal References:

Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)

Minn. Stat. Ch. 14 (Administrative Procedures)

Minn. Stat. § 121A.75 (Receipt of Records; Sharing)

Cross References:

MSBA/MASA Model Policy 722 (Public Data Requests)

MSBA/MASA Model Policy 406 (Public and Private Personnel Data)

MSBA/MASA Model Policy 515 (Protection and Privacy of Pupil Records)