



GRACE SENIOR LIVING

Document Retention and Destruction Policy

Purpose

Grace Senior Living, Inc. is committed to maintaining complete, accurate, and secure records in compliance with applicable federal, state, and local laws. This policy establishes standards for the retention, storage, protection, and destruction of organizational records to ensure legal compliance, operational efficiency, and accountability.

Scope

This policy applies to all records created, received, maintained, or stored by Grace Senior Living, Inc., regardless of format, including paper documents, electronic records, emails, photographs, databases, cloud-based records, and other digital media.

Corporate Records

Corporate records include governing documents, board and committee records, contracts, correspondence, financial records, personnel files, grant records, tax documents, donor records, and any other records created in the course of conducting organizational business.

Retention of Records

Records shall be retained for the periods established in the organization's Records Retention Schedule. Records designated for permanent retention shall be maintained indefinitely. All records scheduled for destruction shall be destroyed in a secure manner upon expiration of the applicable retention period.

Destruction of Records

Paper records containing confidential information shall be shredded or otherwise rendered unreadable prior to disposal. Electronic records shall be permanently deleted using appropriate methods to prevent reconstruction or unauthorized access.

Litigation Hold

If litigation, an audit, government investigation, regulatory review, or other legal proceeding is pending or reasonably anticipated, all routine destruction of relevant records shall immediately cease. Relevant records shall be preserved until legal counsel or the Board authorizes release of the hold.

Administration and Oversight

The Executive Director and Board of Directors shall oversee implementation and enforcement of this policy. Periodic reviews shall be conducted to ensure compliance with retention requirements and nonprofit governance standards.

Records Retention Schedule

Articles of Incorporation, Bylaws, IRS Determination Letter, Board Minutes, Audited Financial Statements, Major Contracts, Property Records, and Trademark Registrations: **Permanent**.

Financial records, bank statements, payroll records, employee files, grant records, donor records, contracts, insurance records, tax records, and general correspondence: **7 years** unless otherwise required by law.

Employment applications for non-hired applicants: **1 year**.

Workers' compensation claims: **11 years**.

Withholding tax statements: **10 years**.

Board Review

This policy shall be reviewed periodically by the Board of Directors and updated as necessary to reflect changes in legal requirements, nonprofit best practices, and organizational operations.