

Southeastern Association of Law Schools, Inc.

Document Management Policy

(August 3, 2019)

This policy provides for the review, retention, and destruction of documents received or created by the Southeastern Association of Law Schools, Inc. (“SEALS”) in connection with the transaction of organization business. This policy covers all records and documents, regardless of form, and contains guidelines for how long certain documents should be kept and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate SEALS’s operations by promoting efficiency and freeing up valuable storage space.

Set forth below is a list of certain categories of documents commonly received or created (or envisioned to be received or created) by SEALS. Under each is a list of specific documents and the period for which they are to be retained. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time. Additional important policy guidance is provided at the end of the list.

Corporate records

Document	Retention period
Annual reports to the secretary of state	Permanent
Articles of incorporation	Permanent
Board meeting, board committee, and Steering Committee minutes	Permanent
Board policies and resolutions	Permanent
By-laws	Permanent
IRS Form 1023 application for tax-exempt status	Permanent
IRS determination letter	Permanent
State sales tax exemption letter	Permanent
Contracts	7 years after termination

General correspondence	3 years
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Accounting and corporate tax records

Document	Retention period
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IRS Form 990 tax returns	Permanent
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General ledgers and other accounting records	7 years
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IRS Form 1099 information returns	7 years
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Invoices	7 years
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Conference registration and other income records	7 years
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Bank records

Document	Retention period
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Check registers	7 years
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Bank deposit records	7 years
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Bank statement and reconciliation	7 years
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Electronic fund transfer documentation	7 years
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Payroll and employment tax records

Document	Retention period
Payroll records	3 years (or longer if required by state law)
Payroll tax returns	4 years
IRS Form W-2 statements	7 years
Employment tax records	At least 4 years after filing the year's 4th quarter taxes (or longer, if required by state law)

Human resource records

Document	Retention period
Employment, engagement/retention, and termination agreements, if any	Permanent
Records relating to promotion, demotion, or discharge, if any	7 years after termination
Accident reports and workers' compensation records, if any	5 years
Background checks, drug test results, driving records, and employment verifications, if any	5 years
Resumes, employment applications, and related materials (including interview notes) for employees, if any	4 years after termination
Resumes, employment applications, and related materials (including interview notes) for applicants not hired, if any	3 years
Timesheets/records of work performed, compensation history, and job history, as applicable	4 years after termination
Performance appraisal and disciplinary action records, if any	4 years after termination
USCIS Form I-9 employment eligibility verifications	3 years after hire date or 1 year after employment ends (whichever is later)

Donor and grant records

Document	Retention period
Donor records and acknowledgment letters	7 years
Grant applications and contracts, if any	7 years after expiration

Legal, insurance, and safety records

Document	Retention period
Copyright registrations, if any	Permanent
Insurance policies	Permanent
Investment (e.g., stock, bond) records, if any	Permanent
Trademark registrations, if any	Permanent
Leases, if any	7 years after expiration
OSHA documents, if any	5 years

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types listed above must 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.

Document Destruction

SEALS’s Secretary, Treasurer, and Corporate Compliance Officer share responsibility for the ongoing process of identifying records that have met the required retention period and overseeing their destruction. Destruction of hard-copy financial and personnel-related documents will be accomplished by shredding.

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

Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against SEALS and its employees and possible disciplinary action against responsible individuals. The Board of Trustees will periodically review these procedures with legal counsel or the organization’s accountant to identify best practices and ensure that the policy complies with current law and regulation.