Free Clinics of Michigan

 Document Retention and Destruction Policy

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| **PURPOSE OF THIS TOOL:** Certain federal laws prohibit the destruction of certain documents. Not-for-profit organizations should have a written, mandatory document retention and periodic destruction policy. Policies such as this will eliminate accidental or innocent destruction. In addition, it is important for administrative personnel to know the length of time records should be retained to be in compliance.  |

Document Destruction

The Document Retention and Destruction Policy identifies the record retention responsibilities of staff, volunteers, members of the board of directors, and outsiders for maintaining and documenting the storage and destruction of the organization’s documents and records.

Free Clinics of Michigan’s staff, volunteers, members of the board of directors, committee members and outsiders (independent contractors via agreements with them) are required to honor the following rules:

1. Paper or electronic documents indicated under the terms for retention in the following section will be transferred and maintained by the Board of Directors Treasurer, Secretary or Executive Director as indicated below.

*b.* All other paper documents will be destroyed after three years;

*c.* All other electronic documents will be deleted from all individual computers, data bases, networks, and back-up storage after one year;

*d.* No paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation (check with legal counsel or the human resources department for any current or foreseen litigation if employees have not been notified); and

*e.* No paper or electronic documents will be destroyed or deleted as required to comply with government auditing standards (Single Audit Act).

Record Retention[[1]](#footnote-1)

The following table\* indicates the minimum requirements and is provided as guidance to customize in determining your organization’s document retention policy. Because statutes of limitations and state and government agency requirements vary from state to state, each organization should carefully consider its requirements and consult with legal counsel before adopting a Document Retention and Destruction Policy. In addition, federal awards and other government grants may provide for a longer period than is required by other statutory requirements.

| **Type of Document** | **Minimum Requirement** |
| --- | --- |
| Accounts payable ledgers and schedules T | 7 years |
| Audit reports T | Permanently |
| Bank reconciliations T | 2 years |
| Bank statements T | 3 years |
| Checks (for important payments and purchases) T | Permanently |
| Contracts, mortgages, notes, and leases (expired) ED | 7 years |
| Contracts (still in effect) ED | Contract period |
| Correspondence (general) S/ED | 2 years |
| Correspondence (legal and important matters) ED | Permanently |
| Correspondence (with customers and vendors) T/ED | 2 years |
| Deeds, mortgages, and bills of sale ED | Permanently |
| Depreciation schedules T | Permanently |
| Duplicate deposit slips T | 2 years |
| Employment, volunteer applications ED  | 3 years |
| Expense analyses/expense distribution schedules T | 7 years |
| Year-end financial statements ED | Permanently |
| Insurance records, current accident reports, claims, policies, and so on (active and expired) ED | Permanently |
| Internal audit reports T/ED | 3 years |
| Inventory records for products, materials, and supplies T | 3 years |
| Invoices (to customers, from vendors) T | 7 years |
| Minute books, bylaws, and charter S | Permanently |
| Current licenses and certifications (volunteers, lab, pharmacy) ED | 7 years |
| Payroll records and summaries T | 7 years |
| Personnel files (terminated employees) ED | 7 years |
| Retirement and pension records T | Permanently |
| Tax returns and worksheets T | Permanently |
| Timesheets T | 7 years |
| Non Profit 501 required yearly documents: Annual Report, MI Solicitation License Renewal T/ED | Permanently |
| Withholding tax statements T | 7 years |

Resources

 National Council of Nonprofits www.councilofnonprofits.org

 BoardSource Record Retention and Document Destruction Policy—Download 4 Samples (E-Policy Sampler) www.boardsource.org/Bookstore.asp?Type=epolicy&Item=1071

 Independent Sector www.independentsector.org/issues/sarbanesoxley.html

 AICPA Management of an Accounting Handbook—2003 and IRS Appendix Document www.cpa2biz.com/AST/Main/CPA2BIZ\_Primary/PracticeManagement/PracticeAdministration/ PRDOVR~PC-090407/PC-090407.jsp

 Guide to Record Retention Requirements in the Code of Federal Regulations: Contact the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402-9325 or from CCH, Inc. at www.onlinestore.cch.com

Approved by Board of Directors via email 3/17/21.

**ADDITION: 11/7/2022**

 Retention of Medical Records

 In Michigan, medical records must be kept for 7 years. Many clinics keep them for 10 years. Use the link for more explanation.

[http://legislature.mi.gov/doc.aspx?mcl-333-16213](http://legislature.mi.gov/doc.aspx?mcl-333-16213%0c)

1. \* Adapted from National Council of Nonprofits. [↑](#footnote-ref-1)